

ALETHEA O'TOOLE  
1308 E Colorado Blvd., #516  
Pasadena, CA 91106  
Phone Number: (213)656-5254  
Email Address: [a.otoole@live.com](mailto:a.otoole@live.com)  
Plaintiff In Pro Se

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

CV24-10996-MRA(SKx)  
) Case No.:  
NAME OF PLAINTIFF,  
)  
Alethea C. O'Toole and Hunter J. O'Toole  
)  
Plaintiff(s),  
)  
vs. ) COMPLAINT FOR RELIEF,  
) REMEDIES, AND  
) DAMAGES CAUSED BY  
NAME OF DEFENDANT(s), ) COPYRIGHT©  
) INFRINGEMENT, AND  
Nickelodeon Animation Studio et al/National ) ADDITIONAL CAUSES OF  
Amusements/Paramount Global/ ) ACTION  
ViacomCBS/Nickelodeon Group, Shari E. )  
Redstone, Robert M. Bakish, Chris M. Savino, )  
Jenna Boyd, British Film Institute, Netflix et al, )  
Chrysalis, Variety Magazine et al, TajMania )  
Entertainment et al, Larry Juris, Howard Gimple, )  
Rebecca "Becky" Gimple, Sam Laskey, )  
Emanuel "Manny" Reyes, Tom Caggiano, ) JURY TRIAL DEMANDED  
Darryl Scott Haynes, Tureka Tara Turk-Haynes, - YES: X  
Luz "Lucy" M Magaña, Guillermo Argueta,  
Carlos Velasco, Sgt. Rebecca Gomez  
(Individual), Sgt. Jeffery Whitney (Individual),  
Chief Eugene Harris (Individual) and 500+ does  
Defendant(s)

COMPLAINT FOR RELIEF, REMEDIES, AND DAMAGES CAUSED BY COPYRIGHT© INFRINGEMENT, AND  
ADDITIONAL CAUSES OF ACTION

## JURISDICTION

- 1) This court has jurisdiction over 28 U.S.C. § 1331 (Federal Question) and the Constitutional laws contained in the Copyright Act of 1976, the Lanham's Act, the Sherman Act, and U.S. Code - Unannotated Title 28, U.S.C.A. § 1338(a) which provides the court with exclusive and original jurisdiction of any civil action arising under any Act of Congress, or asserting a claim of unfair competition when joined with a substantial and related claim under the copyright, patent, plant variety protection or trademark laws. In addition Title 17 of the Copyright Act, 17 U.S.C.A. §§101 et seq., provide the court jurisdiction over federal question that arise pursuant, but not limited to, the following copyright codes of action: 17 U.S. Code § 501 Infringement of copyright; 17 U.S. Code § 506 criminal offenses by willful copyright; 17 U.S. Code § 201 Ownership of copyright, 17 U.S. Code § 204 Execution of transfers of copyright ownership, 17 U.S. Code § 511 liability of States, instrumentalities of States, and State officials for infringement of copyright, 17 U.S. Code § 602 Infringing importation or exportation, 17 U.S. Code § 603 Importation prohibitions: Enforcement and disposition of excluded articles, the illegal use of copyright notices outlined in 17 U.S. Code § 401 and 17 U.S. Code § 404, and 17 U.S. Code § 107 Fair use.
- 2) The court has jurisdiction over Title 18 codes; Section 2319 (relating to criminal infringement of a copyright), 18 U.S.C. §§ 1961-68, specifically section 1961(10)



1 Racketeer Influenced and Corrupt Organizations Act (RICO) of 1970, 18 U.S.C. §  
2 2319 (2022) Criminal infringement of a copyright, 18 U.S. Code §2318 Trafficking  
3 of counterfeit labels, illicit labels, or counterfeit documentation or packaging, 18  
4 U.S. Code §2319C Illicit digital transmission services, 18 U.S. Code §2323  
5 Forfeiture, destruction, and restitution.  
6  
7

8 3) Jurisdiction in this Court is proper pursuant to 28 U.S.C.A. § 1391 Defendants or  
9 their agents are subject to personal jurisdiction in this jurisdiction, a substantial  
10 part of the events or omissions giving rise to the claim occurred in this jurisdiction  
11 including but not limited to contracting for goods and services with the state, and a  
12 substantial part of Plaintiff's copyright property that is the subject of the action is  
13 situated in this jurisdiction and pursuant to a forum selection clauses contained in  
14 contracts consented to by Defendants.  
15  
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17

18 4) Defendants are subject to personal jurisdiction in the forum: (1) pursuant to  
19 CPLR § 302(a)(1) as Defendants transact business within California by  
20 contracting, purchasing or otherwise providing financial relief for the creation and  
21 development of the subject written, and visual work(s) in California; (2) pursuant  
22 to CPLR § 302(a) harm to Plaintiff's property within California; (3) pursuant to  
23 CPLR § 302(a)(3), as Defendants committed a tortious act without the State  
24 causing harm to Plaintiff's property with California and Defendants regularly  
25 engage in business within California and should reasonably expect the act to have  
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1 consequences in the State by reason of the Defendants' act of contracting and  
2 contractual language contained in the agreements and payment schedules between  
3 the Parties their agents, and third parties used to further develop the works in  
4 question.  
5

6  
7 5) This court has supplemental jurisdiction pursuant to 28 U.S.C.A. § 1367 over the  
8 breach of contract claims because the claims are so related to the claims in the  
9 action within the Court's original jurisdiction, they form part of the same case or  
10 controversy under Article III of the United States Constitution.  
11

12  
13 6) Federal jurisdiction is proper to govern over international treaties related to  
14 copyright laws where harm and controversy over the material and merits at hand  
15 occurred in relation to internal laws under; The International Copyright Act of  
16 1891 26 Stat. 1106, Digital Millennium Copyright Act of 1998, World Intellectual  
17 Property Organization Copyright Treaty, FCC International laws Berne  
18 Convention, North American Free Trade Agreement, General Agreement on  
19 Tariffs and Trade 1948, and the Agreement on Trade-Related Aspects of  
20 Intellectual Property Rights outlined by the World Trade Organization.  
21  
22

23  
24  
25 7) The Court is authorized to provide declaratory and injunctive relief pursuant to 28  
26 U.S.C. §§ 2201 and 2202 and has authority over 28 U.S.C.A. § 1332 - Diversity of  
27  
28

1 citizenship; amount in controversy, since the parties hereto are citizens of different  
2 states and the amount in controversy exceeds \$75,000  
3

## 4 VENUE

- 5
- 6 1) Venue over this action in California is proper in this District pursuant to 28 U.S.C.  
7 §1391 U.S. Code Unannotated Title 28 which establishes general venue over  
8 judiciary and judicial procedure in an action in any judicial district in the United  
9 States. Venue is additionally appropriate in this District pursuant to 5 U.S.C. § 703  
10 because the regulatory decisions sought to be reviewed will likely adversely affect  
11 State Statutes including but not limited to: California Statute 344-45, New York  
12 Statute 349-50, Colorado 345-46, Texas 350-51, 325-33 as well as statutes in  
13 Michigan, Georgia, North Carolina, Hawaii, and other states not named herein.  
14
- 15 2) Moreover matters related to and involving acts of racketeering gives proper venue  
16 and process to the Court for charges outlined in 18 U.S. Code § 1965 (a), 18 U.S.  
17 Code § 1965 (b), 18 U.S. Code § 1965 (c), and 18 U.S. Code § 1965 (d) -84 Stat.  
18 944.  
19  
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23 (a)Any civil action or proceeding under this chapter against any person may be  
24 instituted in the district court of the United States for any district in which such  
25 person resides, is found, has an agent, or transacts his affairs.  
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1 (b)In any action under section 1964 of this chapter in any district court of the  
2 United States in which it is shown that the ends of justice require that other  
3 parties residing in any other district be brought before the court, the court may  
4 cause such parties to be summoned, and process for that purpose may be served  
5 in any judicial district of the United States by the marshal thereof.  
6

7  
8 (c)In any civil or criminal action or proceeding instituted by the United States  
9 under this chapter in the district court of the United States for any judicial  
10 district, subpoenas issued by such court to compel the attendance of witnesses  
11 may be served in any other judicial district, except that in any civil action or  
12 proceeding no such subpoena shall be issued for service upon any individual  
13 who resides in another district at a place more than one hundred miles from the  
14 place at which such court is held without approval given by a judge of such  
15 court upon a showing of good cause.  
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18  
19 (d)All other process in any action or proceeding under this chapter may be  
20 served on any person in any judicial district in which such person resides, is  
21 found, has an agent, or transacts his affairs.  
22

23  
24 3) However, the Plaintiff would like the court to consider Federal Multidistrict  
25 Litigation under statute 28 U.S.C. §1407(a) for proceedings in the complaint herein  
26 sighted and brought to the court, by the PLAINTIFFS, Ms. Alethea O'Toole and  
27 Hunter J. O'Toole, individuals, in light of the following factors:  
28

- 1 4) The infringed property is being streamed and televised in all 50 states, and across  
2 over 20 international countries. This far-reaching arm of the infringed property  
3 applies to multiple districts, within multiple states, in multiple municipalities with  
4 various copyright code concerns under question of various federal and FCC laws  
5 which have effected, affected and been affected by such actions and decisions  
6 made by the Defendants listed herein the complaint.  
7  
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9
- 10 5) The sale of Paramount Global, ViacomCSB, and Nickelodeon are currently  
11 pending the finalization of the merger between National Amusements, Inc. and  
12 Skydance Media. National Amusements is an American privately owned mass  
13 media holding company incorporated in Maryland and based in Norwood,  
14 Massachusetts at 846 University Ave Norwood, MA, 02062-2631. The company is  
15 currently the majority holder of Paramount Global, ViacomCBS, and thus  
16 Nickelodeon. Shari Redstone is sole owner of National Amusements and profits  
17 from the merger of the companies. She will receive a \$500 Million dollar parachute  
18 upon exiting among other financial gains. Other recent bidders have included  
19 Edgar Bronfman. A formal announcement was made on July 7th, 2024, between  
20 National Amusements, Paramount, and Skydance Media:  
21  
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23  
24

25 PRESS RELEASE DETAILS  
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SKYDANCE MEDIA AND PARAMOUNT GLOBAL SIGN  
DEFINITIVE AGREEMENT TO ADVANCE PARAMOUNT AS A  
WORLD-CLASS MEDIA AND TECHNOLOGY ENTERPRISE

July 7, 2024

Ellison Family and RedBird Capital Partners to Invest Over \$8 Billion in  
New Paramount and to Acquire National Amusements, Inc.

Paramount Class A Stockholders to Receive \$23 Per Share in Cash/Stock  
Election, Class B Stockholders to Receive \$15 Per Share in Cash/Stock  
Election; Cash Consideration Available to Public Shareholders Totals  
\$4.5 Billion

“LOS ANGELES and NEW YORK, July 07, 2024 (GLOBE  
NEWswire) -- Skydance Media (“Skydance”) and Paramount Global  
(NASDAQ: PARA, PARAA) (“Paramount”) today announced that they  
have entered into a definitive agreement to form “New Paramount” – a  
next-generation media and technology leader, through a two-step  
transaction including the acquisition of National Amusements, Inc.

1 (“NAI”), which holds the controlling share stake in Paramount, and  
2 subsequently a merger of Skydance and Paramount Global.  
3

#### 4 Board Approval

5  
6 On January 2, 2024, the Board of Directors of Paramount formed a  
7  
8 Special Committee of independent directors to evaluate strategic  
9  
10 alternatives, including third party proposals. The Special Committee  
11  
12 reviewed, negotiated, unanimously approved and recommended the  
13  
14 Skydance transaction for approval by the Board. Following formal  
15 approval by the Board, the Transaction Agreement was signed.

#### 16 Investor Call Details

17  
18 Skydance and Paramount will host a call to discuss the transaction with  
19  
20 securities analysts on Monday, July 8, 2024, at 8:30 a.m... Presentation  
21  
22 materials for the call will be available prior to the call at approximately  
23  
24 8:15 a.m. ET and located under “Events and Presentations” in the  
25  
26 “Investors” section on the Paramount website.  
27  
28

#### Advisors



1 RedBird Advisors, BofA Securities, Inc., Moelis & Company LLC and  
2 The Raine Group serve as financial advisors to Skydance and the  
3 Investor Group. Latham & Watkins LLP serves as legal counsel to  
4 Skydance and the Investor Group. Sullivan & Cromwell LLP serves as  
5 legal counsel to RedBird Capital Partners. BDT & MSD Partners serves  
6 as financial advisor to National Amusements, Inc. and Ropes & Gray  
7 LLP serves as legal counsel. Centerview Partners LLC serves as financial  
8 advisor to the Paramount Special Committee and Cravath, Swaine &  
9 Moore LLP serves as legal counsel. Rothschild & Co serves as financial  
10 advisor to Paramount Global and Simpson Thacher & Bartlett LLP serves  
11 as legal counsel.”

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17 6) DEFENDANT Corporation Paramount Global d.b.a. Nickelodeon Group is  
18 headquartered at 1515 Broadway New York, NY 10003. It is likely that litigants  
19 will call on witnesses from multiple states.  
20

21  
22 7) DEFENDANT Howard Gimple, incorporated a company in New York State, in the  
23 year 2017, one year after the first infringement took place. Howard Gimple  
24 initially lived in New York state which is the address associated with his  
25 corporation “Howard Gimple Inc.”.  
26  
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1 8) On or around May 15th, 2023, DEFENDANTS Darryl Scott Haynes and Lucy M.  
2 Magaña sent the PLAINTIFF a handwritten letter by USPS to her Downtown Los  
3 Angeles apartment. The letter stated that Mr. Haynes had swayed and/or bribed a  
4 California Superior Court Judge and an Officer of the Court from deciding against  
5 him in a restraining order case that the PLAINTIFF, Ms. O'Toole filed on behalf of  
6 her and her son in 2023, for claims of stalking, threats, harassment, verbal abuse,  
7 revenge porn, and making multiple libel statements, and other heinous acts. The  
8 requested order included \$5.9 million in emotional damages. Ms. O'Toole refiled  
9 the restraining order with another judge, but the matter was continued after Mr. and  
10 Mrs. Haynes evaded the Sheriff's service and traveled to London by air on May  
11 30th, 2023, the morning of the trailing court date. That order is currently on appeal.  
12 Following is a copy of the letter and the accompanying envelope.  
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1  
2 Heard you took Scott to court and lost, heard you produced  
3 1000's of pages and Scott brought none and you still lost.  
4 You corny bitch! Recently saw Scott at the Disney  
5 Little Mermaid Screening. I took some screenshots from  
6 Scott's phone and You're pussy looks so beat-up  
7 I plan to share them with folks and at Disney and  
8 other studios. By next week, you will be famous!!

10 You were a stupid skank cum dump when we  
11 worked together and you still are. Most  
12 people we worked with thought you were a  
13 dumb bitch! You are poor white trash and  
14 no man would keep you for anything other  
15 than to shoot cum into. Why Scott cares about you  
16 ~~is~~ makes him a dumbass. But now I know  
17 where you live, I will be sure to post your pictures  
18 around dtla. You are a tired old slut - Look at  
19 your self still wearing the same old clothes (from  
20 the court pictures I saw) Also Scott knew the  
21 judge and court officer - He plays softball with  
22 them - You dumb bitch.

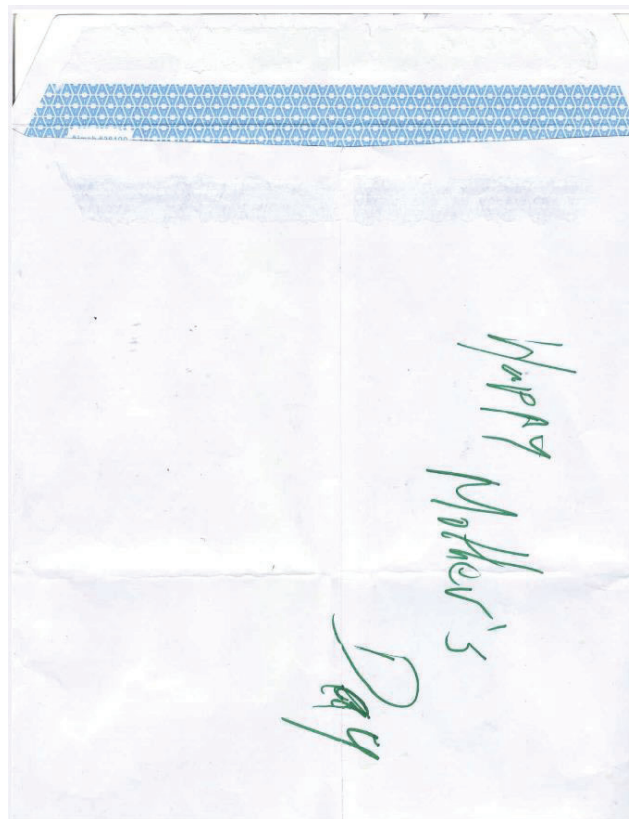


1 You will always be a bottom bitch. All you are good  
2 for is catching cum in your mouth, ass and  
3 that fucked-up / beat-up looking pussy.  
4

5 Fuck you and your dead kid (sure you don't  
6 even know who the father was)  
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8  
9 Fuck you and Scott

10 Love Lucy  
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1 9) On October 2nd, 2024, the PLAINTIFF found reason to believe that her files had  
2 been tampered with and that she was missing evidence from her personal files  
3 saved in her Microsoft Outlook “Cloud.” The PLAINTIFF then discovered that  
4 access to her files had become available to both patrons and employees of a non-  
5 profit organization, called Chrysalis in Los Angeles, California, located at 522  
6 Main St, Los Angeles, CA 90013, on the same block as the PLAINTIFF’S  
7 apartment where she received the letter. Furthermore, the business is sponsored by  
8 Netflix, Walt Disney Resorts, NBC Universal and possibly others, with direct  
9 relation to the case at hand. The organization has been in business for 40 years and  
10 utilizes “professionals” within the industry as volunteers to lead their mandatory  
11 training courses. Besides having influence in theater, television and film, their  
12 influence in California is far reaching. (<https://www.changelives.org/our-partners/>)  
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18 10) Below are screenshots from the company provided by their senior leadership  
19 showing that they had access, and may still have access, to the PLAINTIFF’S files.  
20  
21 The PLAINTIFF had been using Chrysalis’s computer lab from March 2024-  
22 August 2024 to compile evidence and work on the pleadings for this court case, in  
23 addition to looking for work. After these findings the PLAINTIFF discovered that  
24 the evidence she had gathered has been removed from its original source, and that  
25 the websites had suddenly been changed.  
26  
27  
28

10/12/24, 4:01 PM

Gmail - Client Services



Alethea O'Toole <aletheacielle@gmail.com>

## Client Services

Nicole Huezo <Nicole.Huezo@changelives.org>  
To: "aletheacielle@gmail.com" <aletheacielle@gmail.com>  
Cc: Mark Cohen <Mark.Cohen@changelives.org>

Fri, Oct 4, 2024 at 1:24 PM

Good afternoon Alethea,

I hope this message finds you well. I reached out to our IT team to see if they could assist with your One Drive account. It looks like you may have not logged out of your account the last time you accessed it in our computer lab. Our IT team has logged you out, so there shouldn't be additional files uploaded moving forward.

As a reminder, it is clients' responsibility to log out of personal accounts that are accessed on Chrysalis computers. I have attached photos that show your account was initially still logged in, and has now been officially closed by IT.

Please let us know if you have additional questions. Thank you.

Best,



**Nicole Martin Huezo**

Sr. Director of Client Services, Downtown

CHRYSLIS is a nonprofit organization **Changing Lives Through Jobs**

Direct: (213) 995-6945

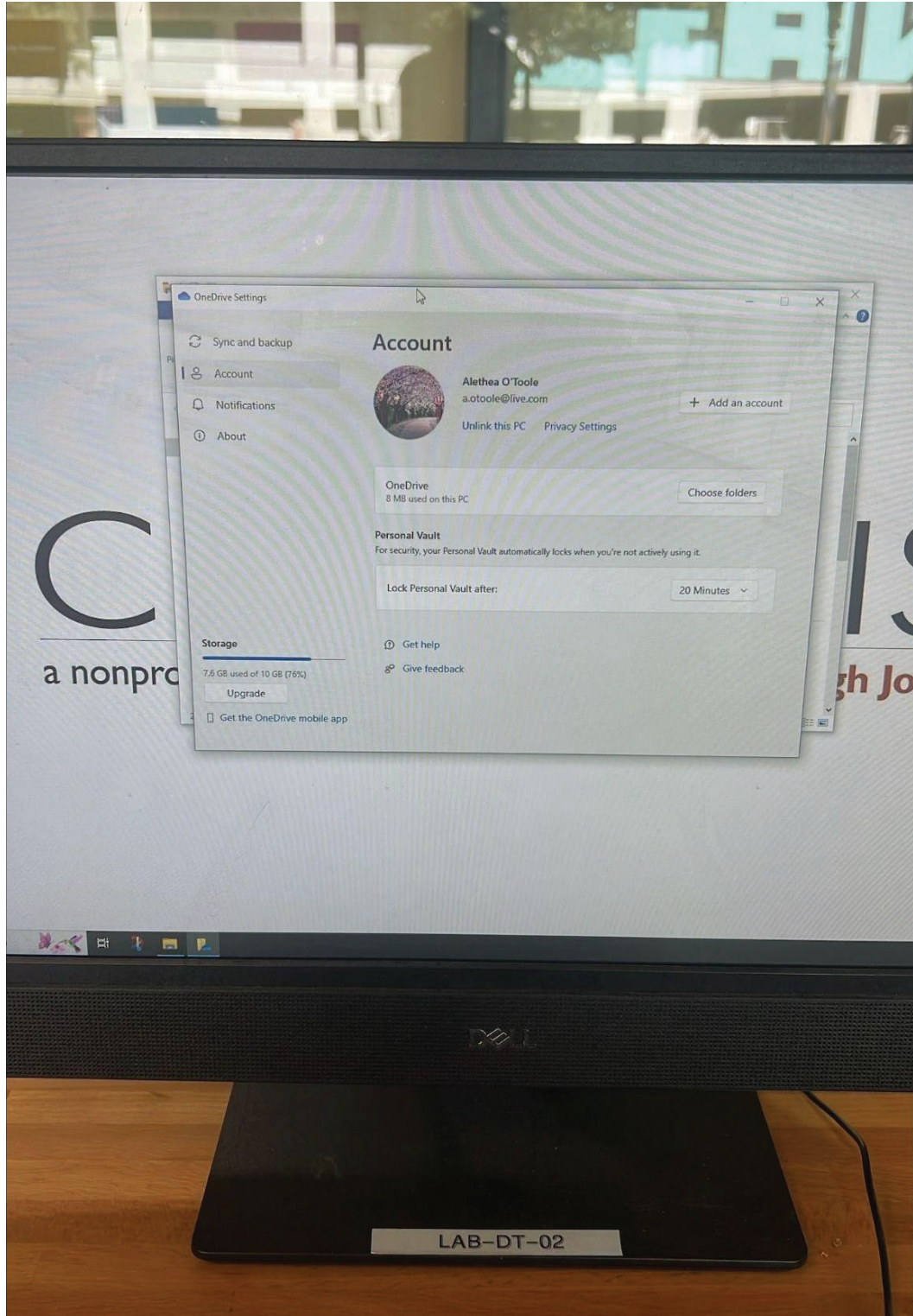
She | Her | Hers

ChangeLives.org



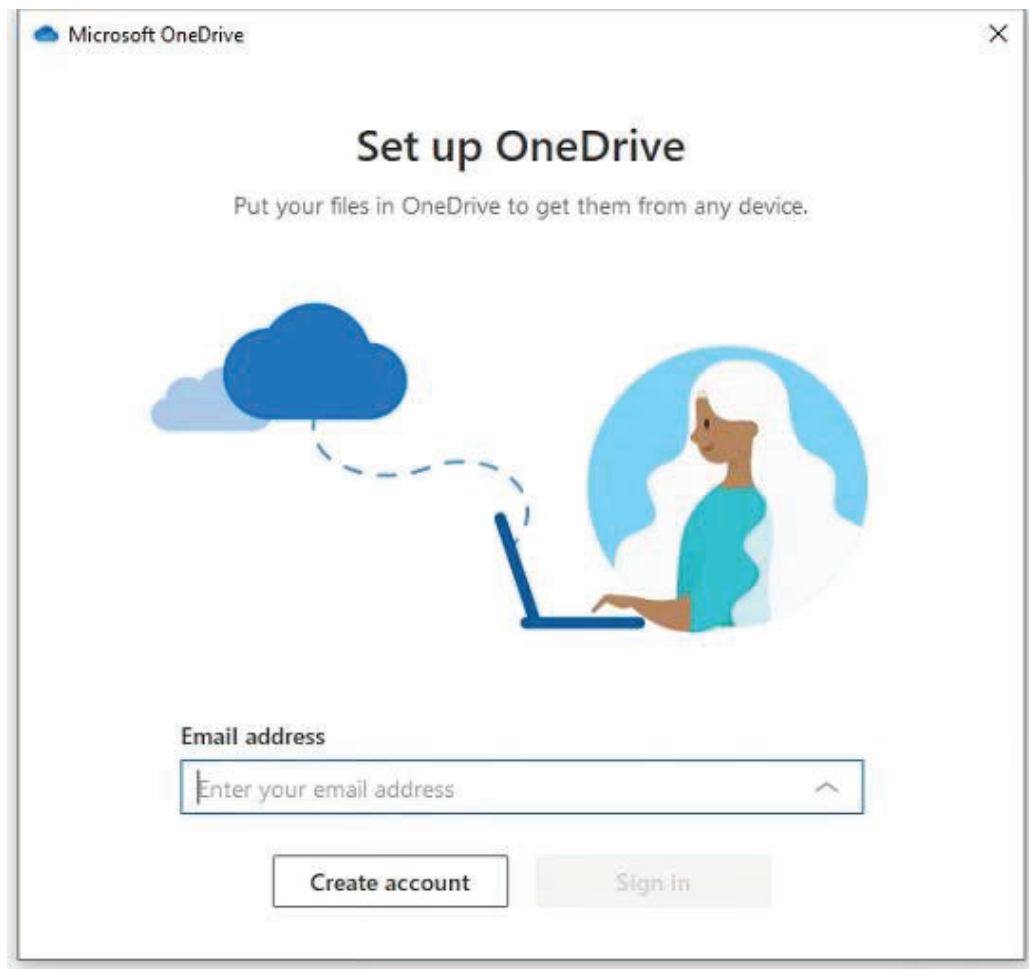
**40 years of Success Bells ringing!**





11) Being that there is no email, name, or other information typed in the email address line of this OneDrive "Setup" page, the PLAINTIFF is unable to clearly

determine who still has access to her private emails, photos, and files. Further emails to determine if she was still logged into other computers at the Chrysalis computer lab and to ensure that they no longer have access have been ignored. Thus, the PLAINTIFF is concerned that spoilage has occurred and will continue to occur.



12) The PLAINTIFF found record that DEFENDANT Darryl “Scott” Haynes has two businesses established under his name. The first, called “The Beach Ltd,” was established under Scott Haynes. “The Beach Ltd” claims to be incorporated and

1 conducting regular business abroad from the Island of Jersey, in the Channel  
2 Islands at the following location: 10-12 Commercial Bldg.,  
3

4 13) The company claims to offer branding and publishing services and has publicly  
5 posted the company website as copyrighted. According to the website the company  
6 has been in existence since 2017 when it established business ties to Standard  
7 Charter Bank and Accurd Jersey Triathlon. The company also shows EY as a  
8 partnering client, which it shares in common with Chrysalis. The files that are  
9 missing from the PLAINTIFF'S personal drive were all related to "The Beach  
10 Ltd." Although the PLAINTIFF lost copies of pertinent information about the  
11 company such as the contact email, the company's phone number and printouts of  
12 the company's website pages, she had compiled the information into presentations  
13 for the court while using the Chrysalis computer lab and is able to present her  
14 findings to the court today. For these reasons and reasons stated herein the  
15 PLAINTIFF believes that spoilage has occurred. The following documents show  
16 the relation between Mr. Haynes and The Beach Ltd.  
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Overview

Company


Experience

Org Chart

News & Media

Similar Profiles

Search for a cor



Scott Haynes

Profile Privacy

Manager of Move Services - Facility Services and Support at The Walt Disney Company

Scott Haynes is a Manager of Move Services - Facility Services and Support at The Walt Disney Company based in Anaheim, California. Previously, Sc...

Read More

Contact

Scott Haynes's Phone Number and Email

Last Update 11/12/2022 3:55 PM

Email s\*\*\*@disneyland.dis

Engage via Email

Contact Number (818) \*\*\*-\*\*\*\*

Engage via Phone

Mobile Number (\*\*\*-\*\*\*-\*\*\*\*)

Engage via Mobile

HQ Phone (714) 781-4565

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Scott Haynes Current Workplace

M V

The Walt Disney Company

COMPLAINT FOR RELIEF, REMEDIES, AND DAMAGES CAUSED BY COPYRIGHT© INFRINGEMENT, AND ADDITIONAL CAUSES OF ACTION

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**Location**  
1313 Disneyland Dr, Anaheim, California, 92802, United States

**Overview** Company Experience Org Chart **News & Media** Similar Profiles

family entertainment and media enterprise. It operates through five business segments: Media Networks, Parks & Resorts, Studio Entertainment, Consume...[Read More](#)

**Industry**  
Amusement Parks, Arcades & At... Recreation Hospitality

[Discover more about The Walt Disney Company](#)

**Scott Haynes Work Experience and Education**

**Work Experience**

Global Facilities Operations  
Leaf Group

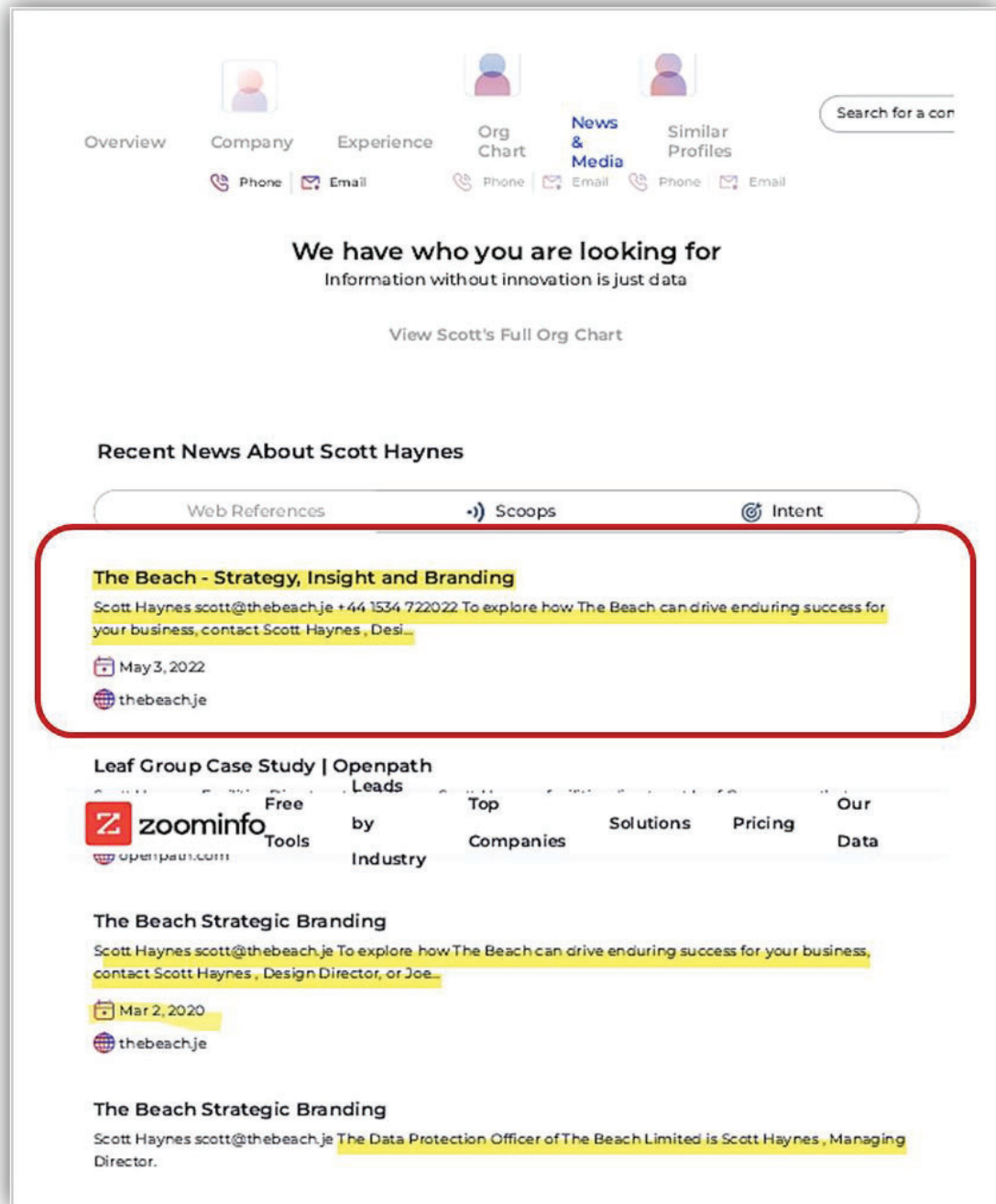
[View Scott Haynes's full profile](#)

**Org Chart - The Walt Disney Company**

**Free Tools** **Leads by Industry** **Top Companies** **Solutions** **Pricing** **Our Data**

[Phone](#) [Email](#)

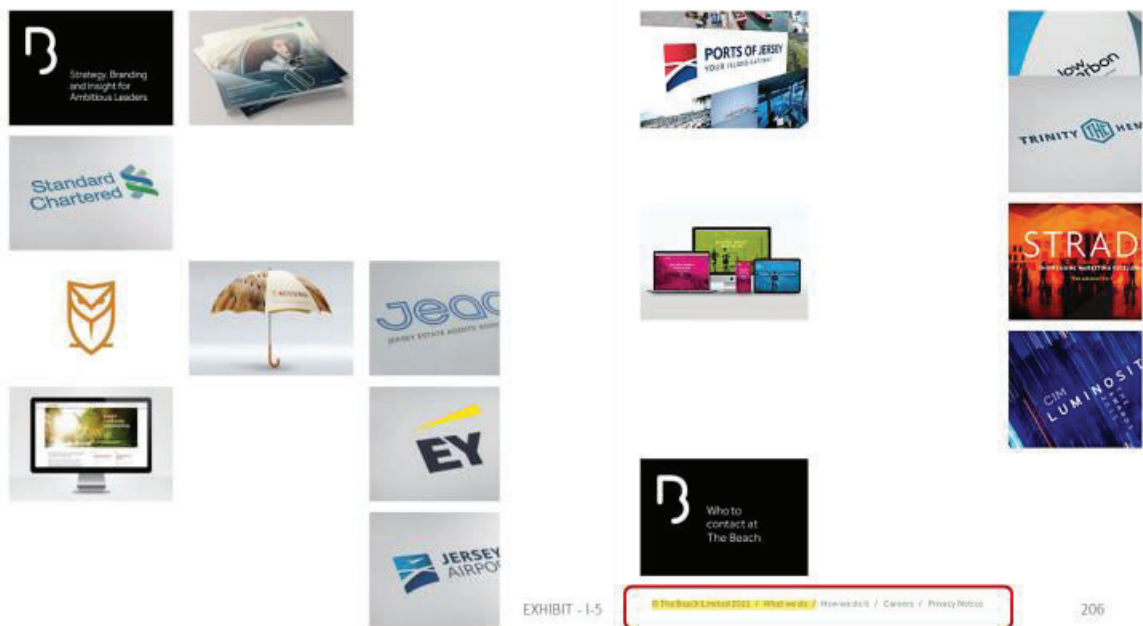




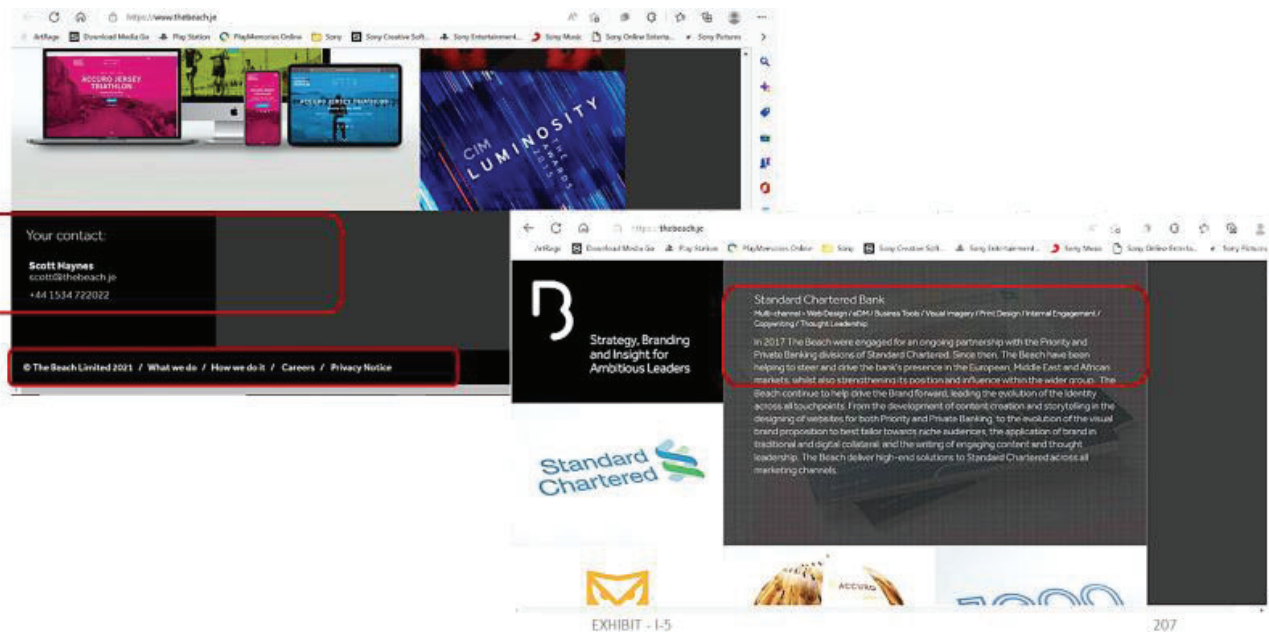
<https://www.zoominfo.com/c/the-beach-ltd/430340356>

14) Below are screenshots of The Beach Ltd. website taken on January 11th, 2023.

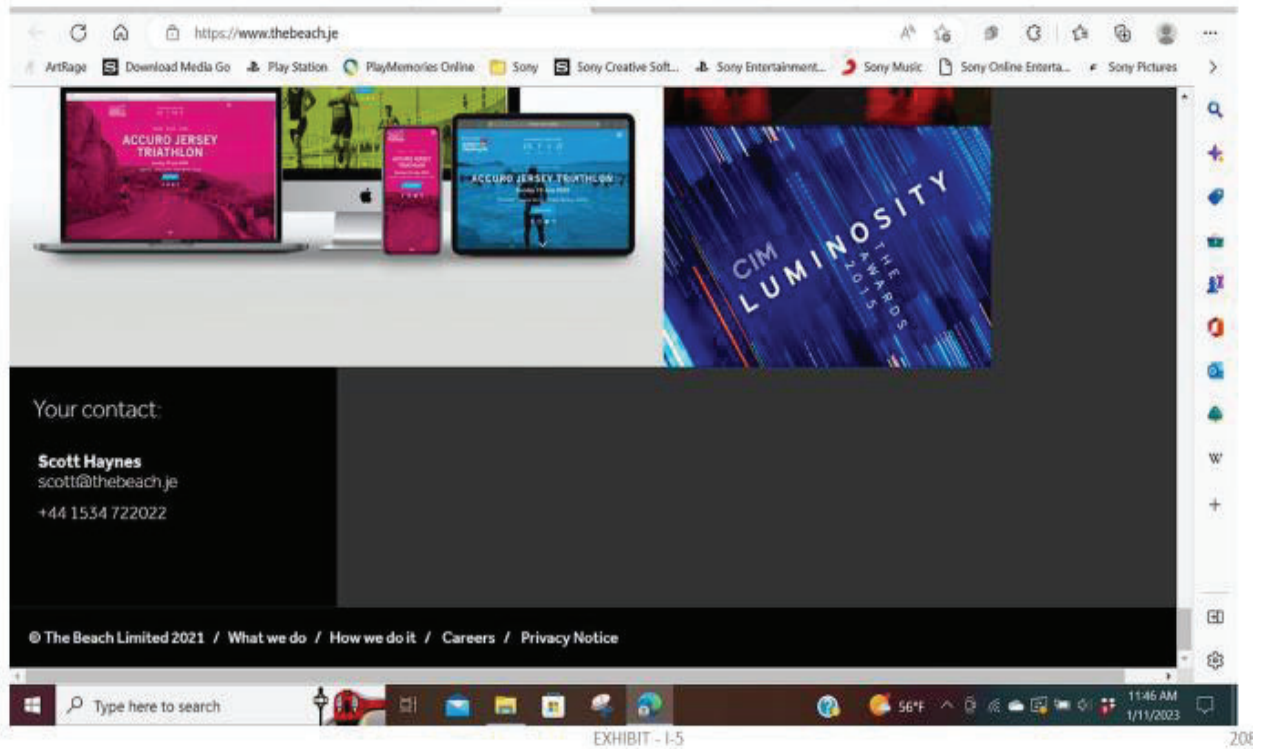
The contact information is listed as Scott Haynes.



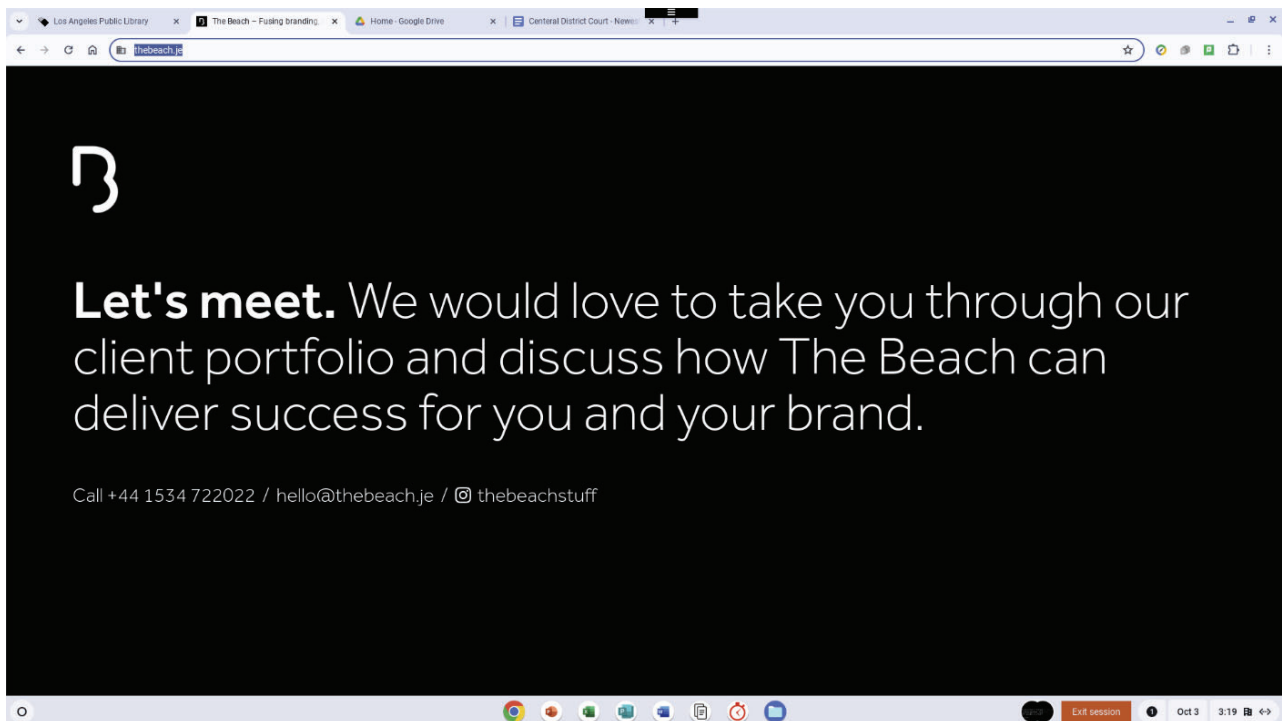
(<https://www.thebeach.je/>)





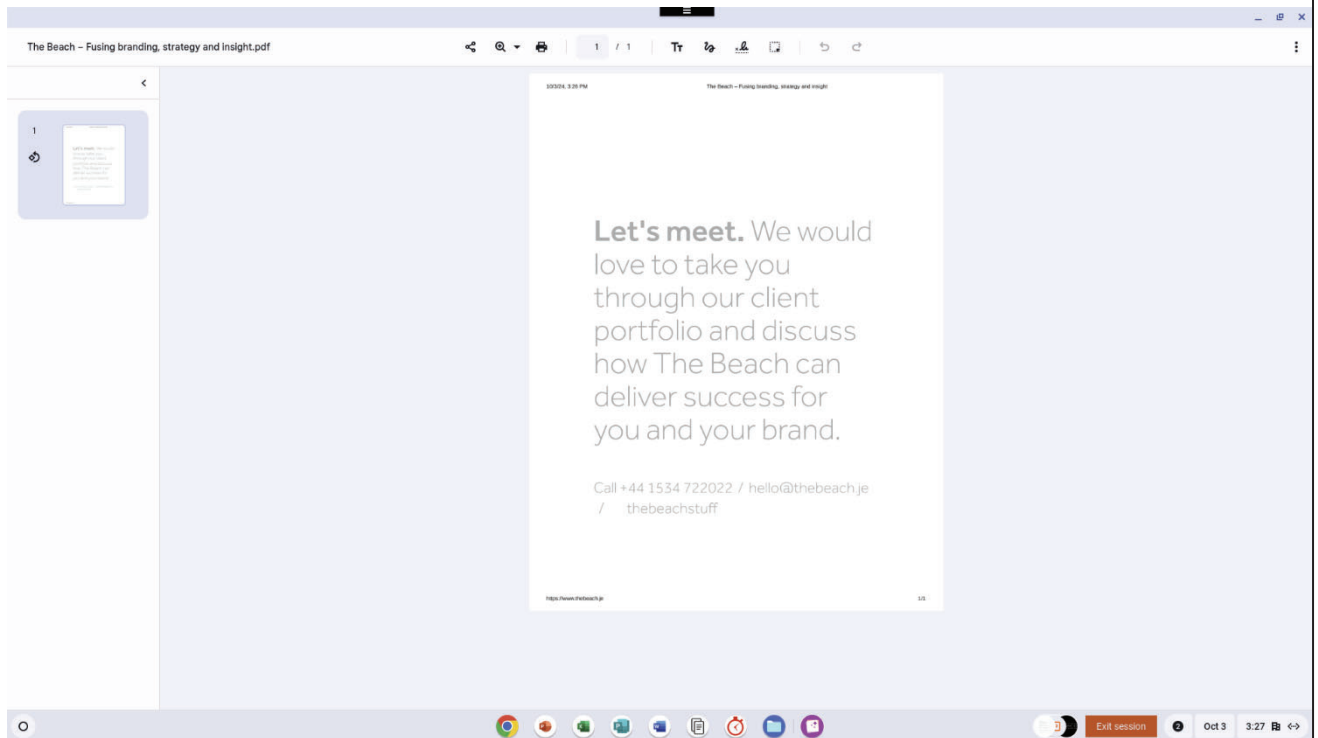


15) Below is a screenshot of The Beach Ltd. website taken October 3rd, 2024.

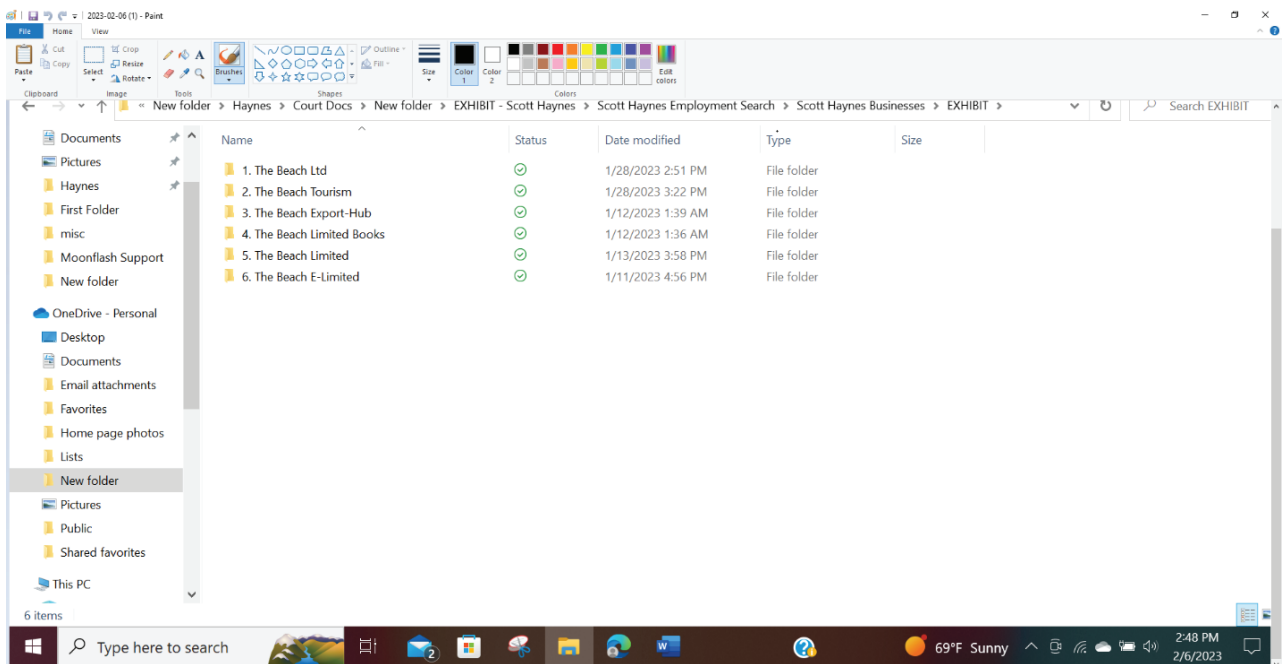
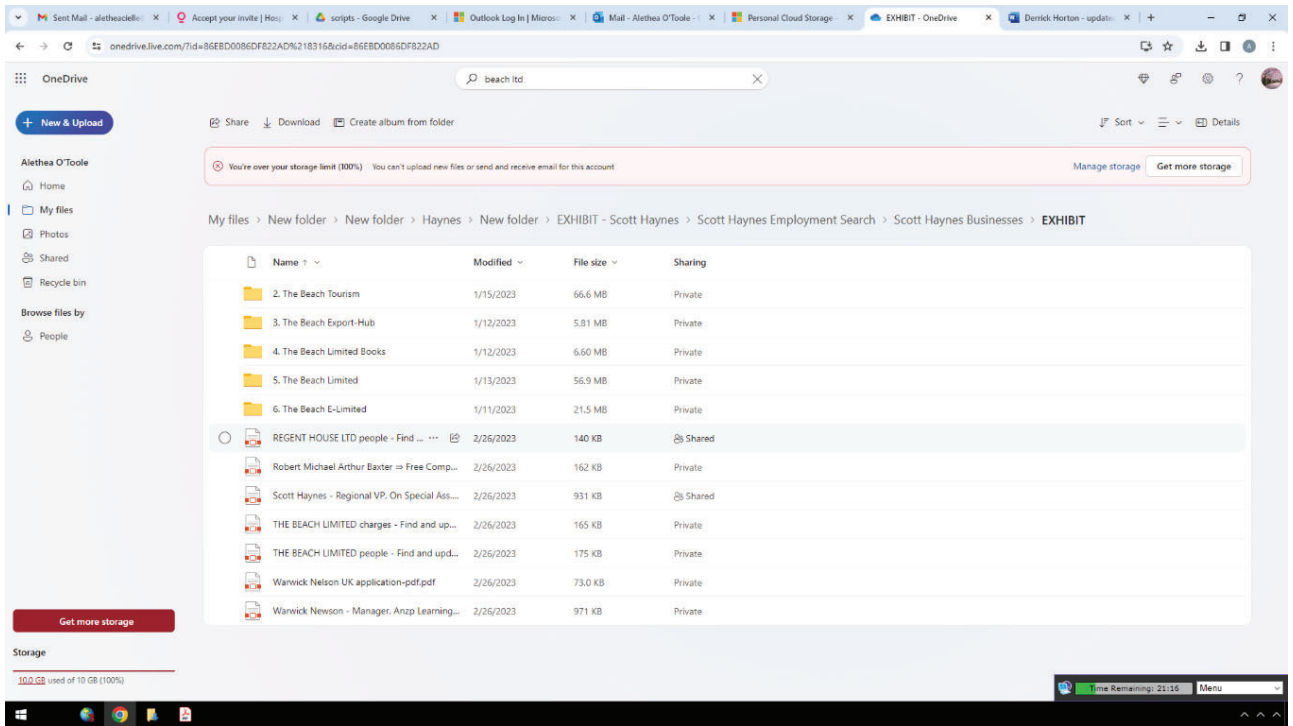


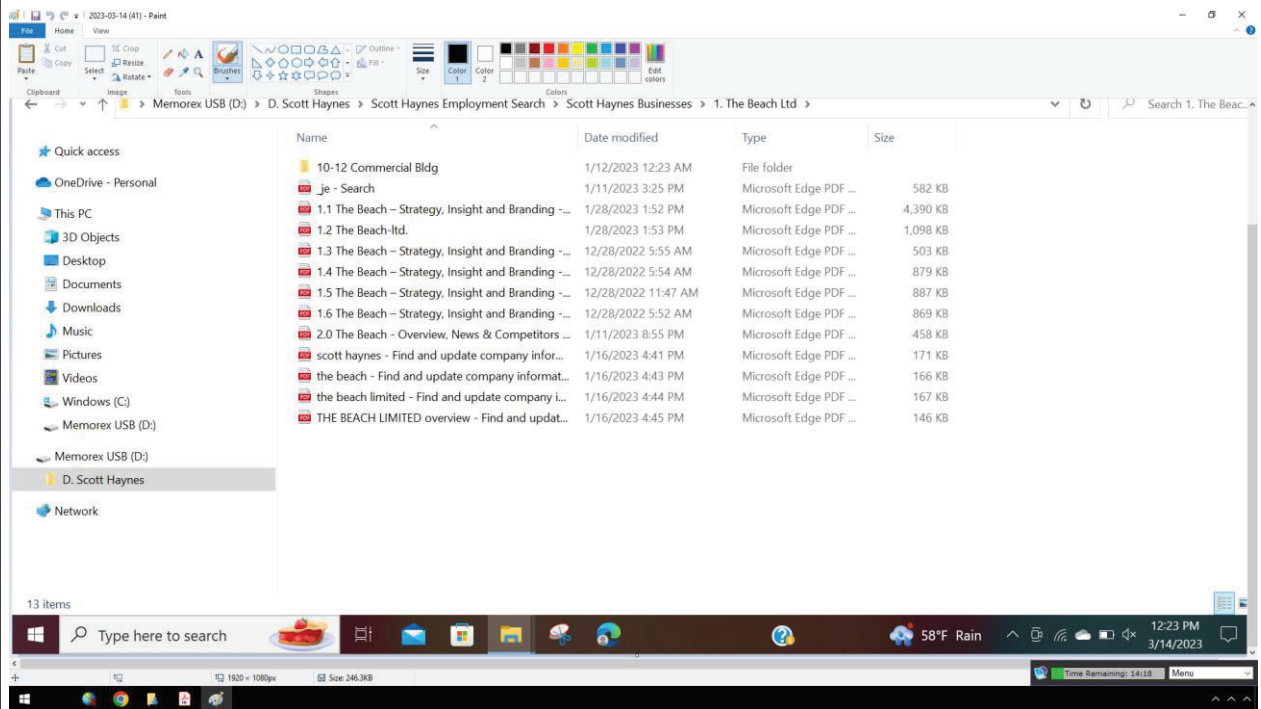
210

COMPLAINT FOR RELIEF, REMEDIES, AND DAMAGES CAUSED BY COPYRIGHT© INFRINGEMENT, AND  
ADDITIONAL CAUSES OF ACTION



18) The next three images are screenshots of the files that were deleted from the PLAINTIFF’S private drive. The first screenshot shows files #2-#6 are still present but file #1 “The Beach Ltd.” is missing. The next screen shot was taken February 2023 when the PLAINTIFF created the files and includes file #1 “The Beach Ltd.” The third image is a list of the documents inside the file that is missing.

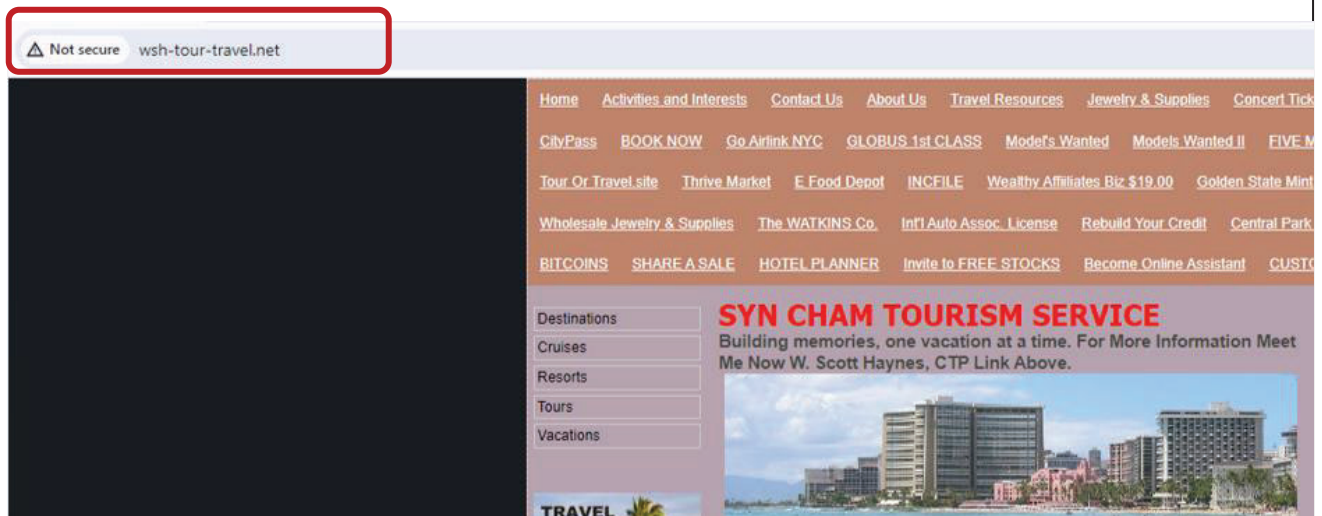
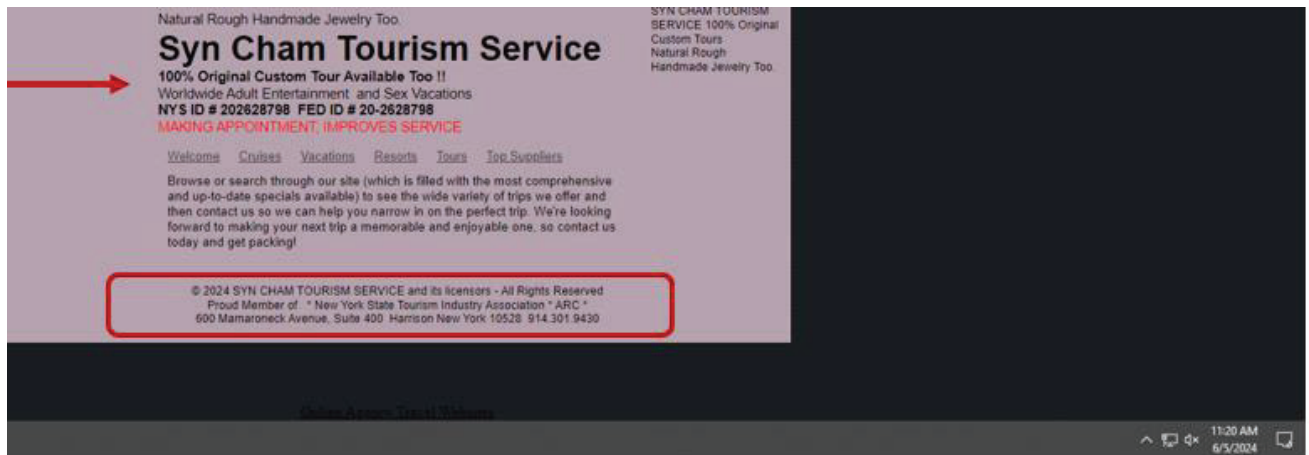


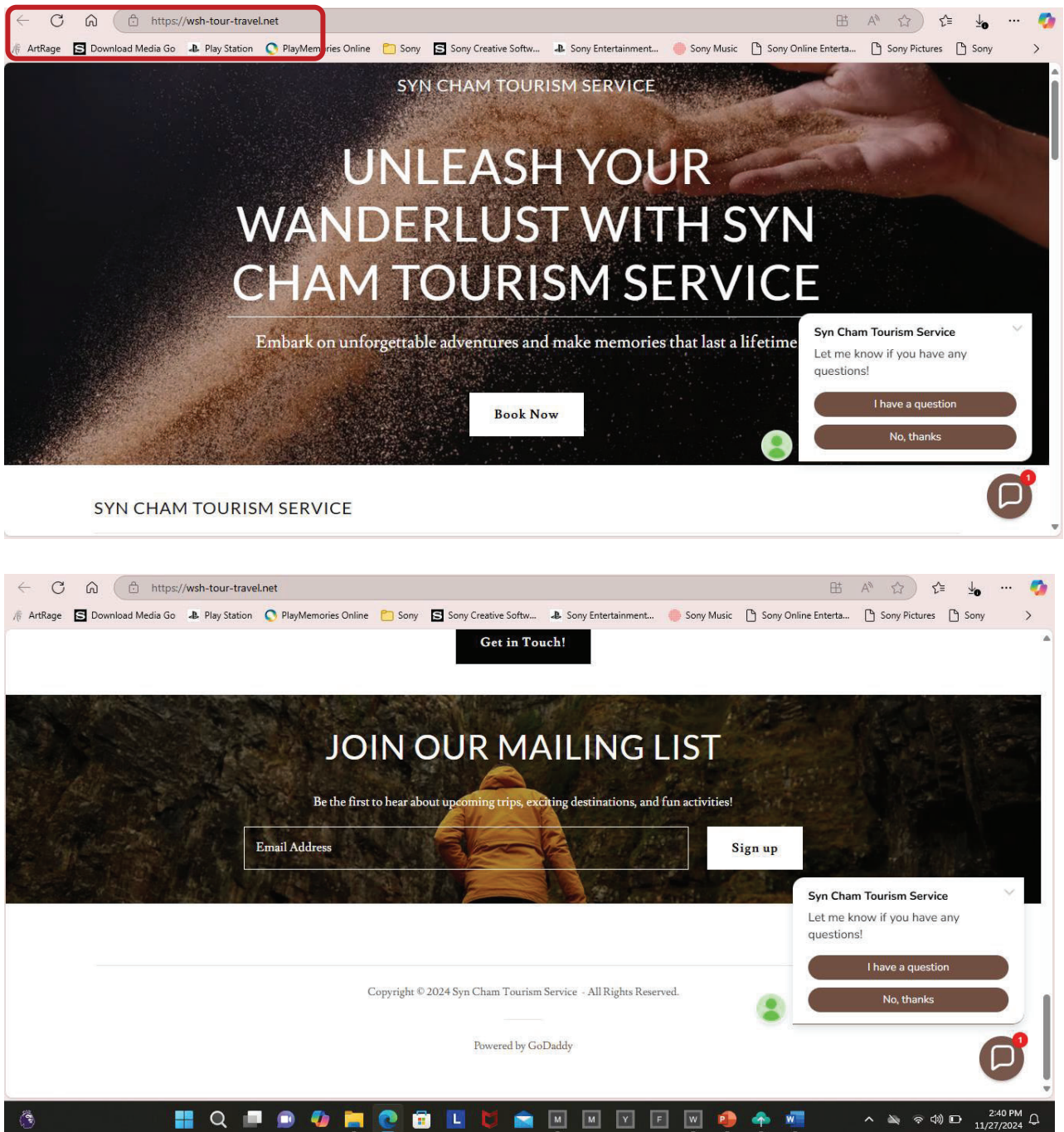


19) Between December 2022 and January 2023, the PLAINTIFF discovered a second company registered to Darry Scott Haynes in New York City, New York. The site described itself as a “Worldwide Adult Entertainment and Sex Tourism site.” On June 5<sup>th</sup>, 2024, while gathering evidence together at the Chrysalis facility the PLAINTIFF was able to locate the website registered to D. Scott Haynes. After the PLAINTIFF’S interactions with Chrysalis, she returned to the site registered at Syn Cham Tourism Service (<https://wsh-tour-travel.net/>) to find that it too had been completely revamped. Below are two images taken of the website prior to any changes being made. The screenshot includes the date and time it was taken. The second image shows the web address. The third image is the new site that was



updated sometime between June 5<sup>th</sup>, 2024, and November 27<sup>th</sup>, 2024. The PLAINTIFF believes that this supports her claim of spoilage.

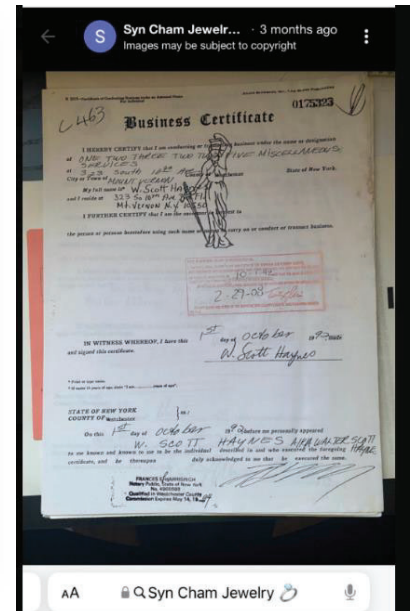
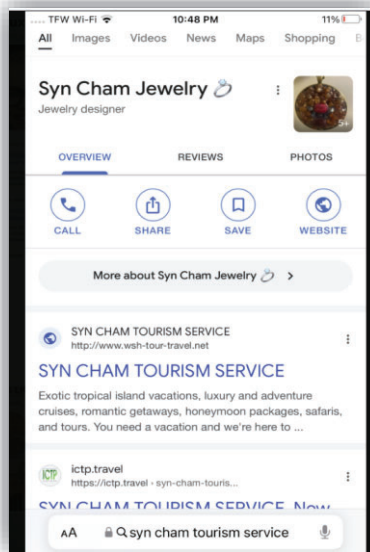




20) The PLAINTIFF is presenting findings of a business certificate registered to Syn Cham Tourism/Syn Cham Jewelry and completed by aka W. Scott Haynes. The certificate was posted on a company link and lists 323 S. 10<sup>th</sup> Ave, Mount



Vernon, New York 10550 as the address associated with Syn Cham Jewelry. A second address for the company was listed on a shipping label posted by someone at the company. This address matches one of the four addresses associated with Syn Cham Tourism Services at 600 Mamaroneck Ave., Suite 400, Harrison, New York 10528. The picture includes a dozen loose jeweled stones sent by USPS establishing the address for the business.



21) The business certificate also offers a handwriting sample that the PLAINTIFF claims to match the handwriting in the letter sent to her Los Angeles apartment in 2023 by DEFENDANTS D. "Scott" Haynes and "Lucy" M. Magaña.

**PARTIES**

22) **Plaintiff Alethea C. O'Toole:** Upon information and belief, that at all times hereinafter mentioned, the Plaintiff, Alethea C. O'Toole (herein "PLAINTIFF") is an individual with her principal place of residency at 1308 E Colorado Blvd. #516, Pasadena, CA 91106 and is authorized to license, sell, distribute, develop or otherwise use written and visual works created by Plaintiff.

23) Upon information and belief, Plaintiff is the copyright registrant for the written and illustrated works in question.

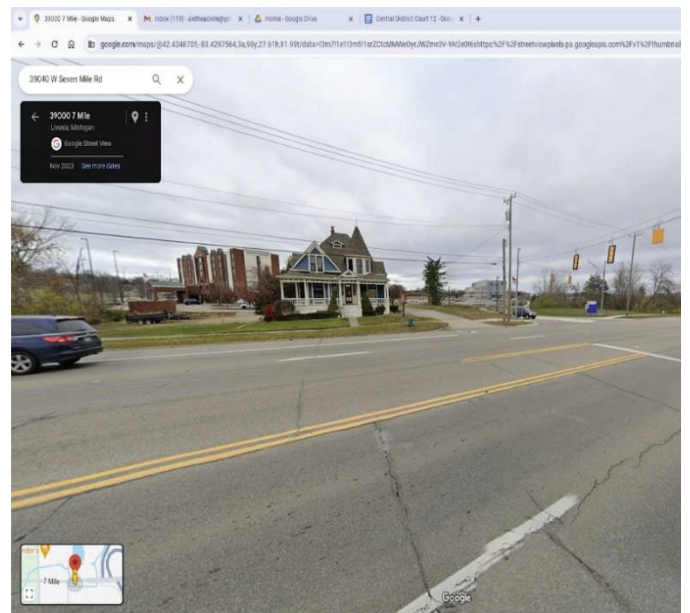
24) She is the mother of PLAINTIFF Hunter J. O'Toole. In 2007 she received a double degree from the University of Hawaii, in Business Administration and Theatre Arts. She was a collegial student who earned a scholarship and graduated with top marks. In 2006 she was accepted into New York University's Tisch School for the Arts, where she completed a summer program in film and commercial studies. Prior to moving to California she interned at a radio station, was a DJ at the UHH campus radio station, was on the college newspaper as a photojournalist, took children's linguistics, art, theater, music, dance, marketing, finance, business, and worked in the costume shop at the UH Hilo Performing Arts Center.

1 25) In 2009 she moved to Hollywood California with her son Hunter O'Toole. In  
2 2010 she began working at Corovan on the Walt Disney studio lot in Burbank,  
3 California. She later became an employee of The Walt Disney Company where she  
4 worked under the President of ABC Family, as well as several other high-level C+  
5 executives throughout the company. In 2012 she was accepted into the Disney  
6 Writer's Group where she continued to participate until 2014.  
7  
8

9  
10 26) In 2014 she worked on two feature films. More recently in 2021 she placed two  
11 scripts in a 24-hour script writing contest. Ms. O'Toole also received a certificate  
12 in Financial Accounting from Harvard University. Since leaving The Walt Disney  
13 Company she has worked in contract accounting positions in Los Angeles, CA and  
14 Detroit, MI. <https://www.imdb.com/name/nm4994718/>  
15  
16 <https://www.linkedin.com/in/aletheaotoole/>  
17  
18

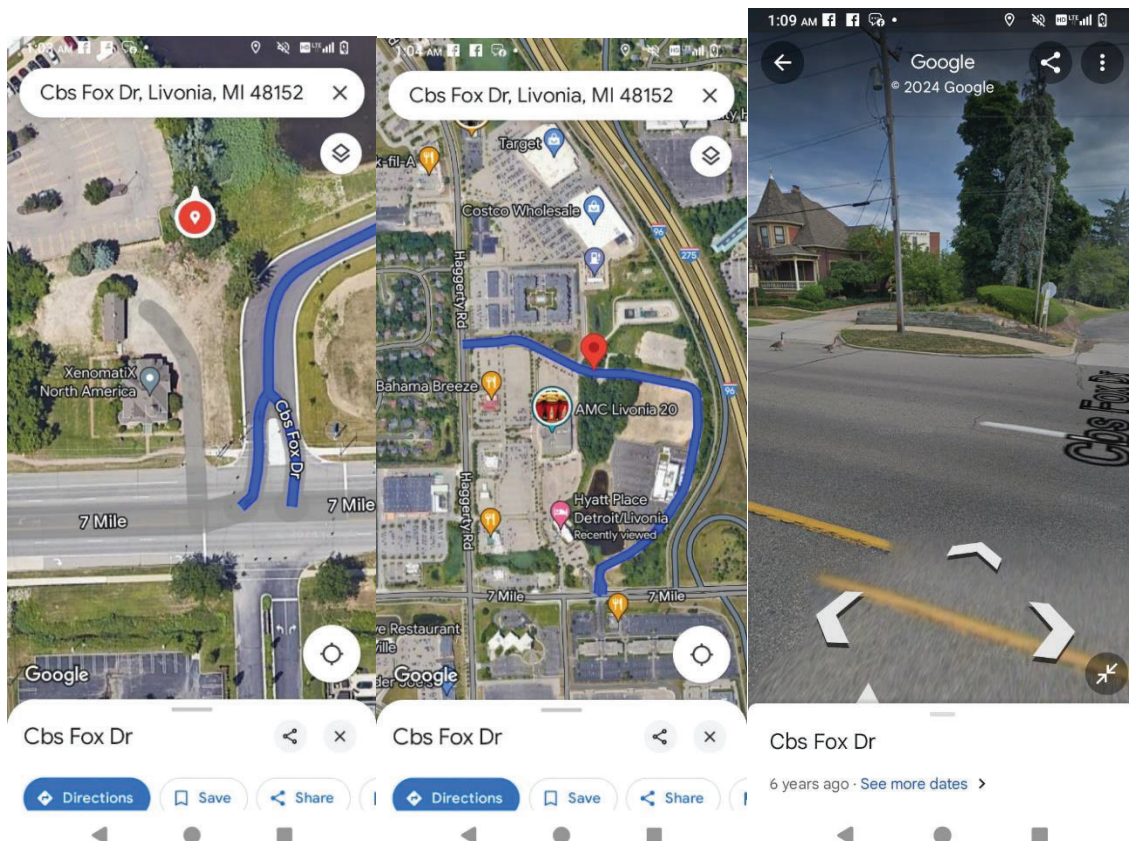
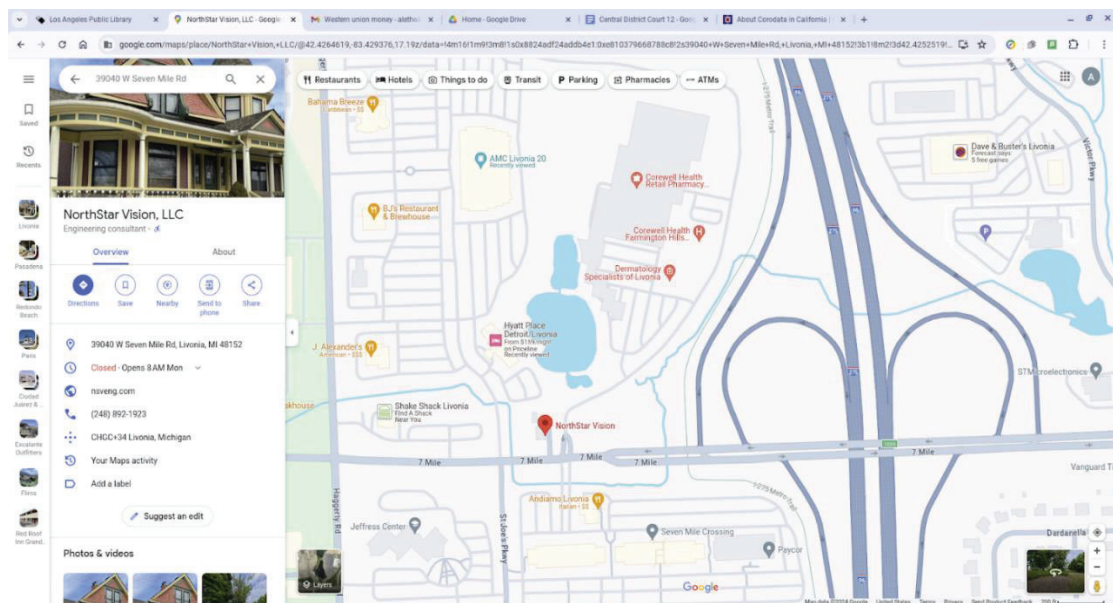
19 27) Ms. O'Toole is originally from Livonia, MI where she lived with her mother  
20 and grandparents on 7 Mile Rd. Her grandparents were active members of the  
21 community and were avid in collecting antiques, art and restoring relics. In 1979,  
22 after hearing of future plans by the city and CBS/Fox Video to buy up, and  
23 industrialize two square miles surrounding their property, they registered the home  
24 on the National Registry of Historical Places. In 1980 they sold the home. In 1985  
25 CBS/Fox Video built their headquarters on the lot adjacent to the house, on the  
26  
27  
28

other side of the pond. Today, CBS/Fox Drive continues to run next door to the house, which is the only residence still standing in the area. (See EXHIBIT)



[https://en.wikipedia.org/wiki/Orson\\_Everitt\\_House](https://en.wikipedia.org/wiki/Orson_Everitt_House)





([https://simple.wikipedia.org/wiki/CBS/Fox\\_Video](https://simple.wikipedia.org/wiki/CBS/Fox_Video))

([https://www.avid.wiki/CBS/Fox\\_Video](https://www.avid.wiki/CBS/Fox_Video))

1 28) **Plaintiff Hunter J. O'Toole:** Upon information and belief, that at all times  
2 hereinafter mentioned, the Plaintiff, Hunter J. O'Toole (herein "PLAINTIFF") is  
3 an individual with her principal place of residency at 1308 E Colorado Blvd. #516,  
4 Pasadena, CA 91106.  
5

6  
7 29) Hunter was raised in Hilo, HI and Pasadena, CA. Hunter moved with his  
8 mother to California at the age of 10. Hunter often accompanied his mother to  
9 work at the university, would occasionally come on Disney campus, and later  
10 helped her on two low budget feature films in 2014. He first met Defendant Darryl  
11 Scott Haynes between the age of 10-11. Hunter is currently a student who is  
12 pursuing education in Cyber Security and Computer Science. (See EXHIBIT)  
13  
14

15  
16 <https://www.linkedin.com/in/hunter-o-toole-a04460165/>  
17

18 <https://www.imdb.com/name/nm5294372/>  
19

20 30) **Defendant National Amusements:** Upon information and belief, that at all  
21 times hereinafter mentioned, the Defendant National Amusements/Paramount  
22 Group (hereinafter "COMPANY") owns and operates Nickelodeon Animation  
23 Studios, and Nickelodeon Group, a division of the COMPANY with its principal  
24 place of business at 846 University Ave, Norwood, MA 02062-2631.  
25  
26  
27  
28

1 31) National Amusements, Inc. is an American privately owned movie theater  
2 operator and mass media holding company incorporated in Maryland.  
3

4 32) On June 10, 1987, the company became the majority owner of the original  
5 incarnation of Viacom,[3] a former CBS subsidiary syndicating television  
6 programs to stations around the United States. Since the buyout, Viacom continued  
7 to expand through purchases from the early 1990s to the early 2000s, announcing  
8 plans to merge with Paramount Communications (formerly Gulf+Western), parent  
9 of Paramount Pictures, in 1993 (which closed in 1994), buying the Blockbuster  
10 Video chain in 1994, merging with the original CBS Corporation in 2000,[4] and  
11 acquiring BET Holdings (which became BET Media Group) in 2001.[5]  
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16 33) National Amusements owns a 9.7% equity stake and 79.9% voting interest in  
17 Paramount Global, and used to operate its predecessors, the second CBS  
18 Corporation and the second Viacom before their closure in 2019, both split from  
19 the also defunct First Viacom.[29] The company may hold an unspecified stake in  
20 Audacy, Inc., as part of the reverse Morris trust that spun CBS's radio assets off to  
21 that company; CBS Corporation shareholders overall held a 72% stake in the then-  
22 named Entercom as of the spin-off.[30]  
23  
24  
25

26 34) National Amusements was founded by Michael Redstone, and later passed to  
27 his son Sumner Redstone. After his 2020 death, the company was passed to a trust  
28

1 led by his daughter Shari Redstone. After nearly 90 years of control by the  
2 Redstone family, in July 2024, David Ellison's Skydance Media announced its  
3 intent to acquire National Amusements and perform an all-stock merger between it  
4 and Paramount Global. ([https://en.wikipedia.org/wiki/National\\_Amusements](https://en.wikipedia.org/wiki/National_Amusements)) (See  
5 EXHIBIT)  
6  
7

8 **35) Defendant Paramount Global:** Paramount Global (also known simply as  
9 Paramount) is an American multinational mass media and entertainment  
10 conglomerate controlled by National Amusements and headquartered at One Astor  
11 Plaza in Times Square, Midtown Manhattan. The company was formed on  
12 December 4, 2019, as ViacomCBS through the merger of the second incarnations  
13 of CBS Corporation and Viacom[4] (which were split from the original Viacom on  
14 December 31, 2005). The company took its current name on February 16, 2022.[5]  
15  
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19 **36)** Paramount's main properties include the namesake Paramount Pictures film and  
20 television studio, the CBS Entertainment Group (consisting of the CBS and  
21 partially owned The CW television networks and television stations, BET Media  
22 Group (which oversees the BET and VH1 channels, among others), and other  
23 CBS-branded assets), Paramount Media Networks (consisting of U.S.-based cable  
24 television networks including MTV, Nickelodeon, Comedy Central, CMT,  
25  
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37) Paramount Network, and Showtime) and Paramount Streaming (including Paramount+ and Pluto TV). It also has an international division that manages international versions of its pay TV networks, as well as region-specific assets including Argentina's Telefe, Chile's Chilevisión, the United Kingdom's Channel 5, and Australia's Network 10. From 2011 to 2023, the division also owned a 30% stake in the Italian Rainbow S.p.A. studio.[6]

38) As of 2019, the company operates over 170 networks and reaches approximately 700 million subscribers in 180 countries.[7]

39) In 2024, National Amusements held talks for a potential merger or acquisition of Paramount Global, with Warner Bros. Discovery, Sony Pictures, Apollo Global Management, and Skydance Media all considering acquiring the company. By June 3, Paramount reportedly agreed to merger terms with the latter company. However, by June 11, merger talks between Paramount and Skydance had fallen apart, resulting in the proposed merger being called off. The companies would later re-negotiate the deal, and on July 2, 2024, Skydance reached a preliminary agreement to acquire National Amusements and merge with Paramount to create what is currently being called "New Paramount".[8][9] The transaction is expected to close in the first half of 2025. (See EXHIBIT)

([https://en.wikipedia.org/wiki/Paramount\\_Global](https://en.wikipedia.org/wiki/Paramount_Global))

1 40) **Defendant Viacom/CBS:** Paramount Pictures, CBS, and Viacom each had a  
2 history of being associated with one another through a series of various corporate  
3 mergers and splits.[10] Paramount Pictures was founded in 1912 as the Famous  
4 Players Film Company.[11] CBS was founded in 1927, which Paramount Pictures  
5 held a 49 percent ownership stake in from 1929 to 1932.[12][13] In 1952, CBS  
6 formed CBS Television Film Sales, a division which handled syndication rights for  
7 CBS's library of network-owned television series. This division was renamed CBS  
8 Films in 1958, again renamed CBS Enterprises in January 1968, and finally  
9 renamed Viacom (an acronym of Video and Audio Communications) in 1970. In  
10 1971, this syndication division was spun off amid new FCC rules forbidding  
11 television networks from owning syndication companies (these rules were  
12 eventually abolished completely in 1993).[14] In 1986, Viacom purchased MTV  
13 Networks and Showtime/The Movie Channel Inc. from Warner Communications  
14 and American Express.[15] In 1987, Viacom was acquired by theater operator  
15 company National Amusements.[16]

22 41) In 1999, Viacom made its biggest acquisition to date by announcing plans to  
23 merge with its former parent CBS Corporation (the renamed Westinghouse  
24 Electric Corporation, which had merged with CBS in 1995). The merger was  
25 completed in 2000, resulting in CBS reuniting with its former syndication division.  
26  
27  
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1 On December 31, 2005, Viacom was split into two companies: CBS Corporation,  
2 the former's corporate successor, and the spun-off Viacom company.[18]  
3

4 42) On September 29, 2016, National Amusements, the parent company of CBS  
5 Corporation and Viacom, wrote to Viacom and CBS Corporation encouraging the  
6 two companies to merge back into one company.[19] On December 12, the deal  
7 was called off.[20]  
8  
9

10 43) On January 12, 2018, CNBC reported that Viacom had re-entered talks to  
11 merge back into CBS Corporation, after the merger of AT&T and Time Warner  
12 and Disney's proposed acquisition of most of 21st Century Fox's assets were  
13 announced. Viacom and CBS Corporation also faced heavy competition from  
14 companies such as Netflix and Amazon.[21] Shortly afterward, it was reported that  
15 the combined company could be a suitor for acquiring the film studio  
16 Lionsgate.[22] Viacom and Lionsgate were both interested in acquiring The  
17 Weinstein Company (TWC).[23] Following the Weinstein effect, Viacom was  
18 listed as one of 22 potential buyers that were interested in acquiring TWC.[23]  
19 They lost the bid, and on March 1, 2018, it was announced that Maria Contreras-  
20 Sweet would acquire all of TWC's assets for \$500 million.[24][25] Lantern Capital  
21 would later acquire the studio.  
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1 44) On March 30, 2018, CBS Corporation made an all-stock offer slightly below  
2 Viacom's market value, insisting that its existing leadership, including long-time  
3 chairman and CEO Les Moonves, oversee the re-combined company. Viacom  
4 rejected the offer as too low, requesting a \$2.8 billion increase and that Bob Bakish  
5 be maintained as president and COO under Moonves. These conflicts had resulted  
6 from Shari Redstone seeking more control over CBS Corporation and its  
7 leadership.[26][27]  
8

9  
10  
11 45) Eventually, on May 14, 2018, CBS Corporation sued its and Viacom's parent  
12 company National Amusements and accused Redstone of abusing her voting  
13 power in the company and forcing a merger that was not supported by it or  
14 Viacom.[28][29] CBS Corporation also accused Redstone of discouraging Verizon  
15 Communications from acquiring it, which could have been beneficial to its  
16 shareholders.[30]  
17  
18  
19

20 46) On September 9, 2018, Les Moonves exited CBS Corporation following  
21 multiple accusations of sexual assault. National Amusements agreed to not propose  
22 a CBS Corporation-Viacom merger for at least two years after the date of the  
23 settlement.[32]  
24  
25

26 47) On August 2, 2019, it was reported that CBS Corporation and Viacom agreed to  
27 merge back into one entity, with both companies agreeing on the management  
28

1 team for the merger. Bob Bakish would serve as CEO of the combined company  
2 with the president and acting CEO of CBS Corporation, Joseph Ianniello,  
3 overseeing CBS Corporation-branded assets.[37] On August 7, 2019, CBS and  
4 Viacom separately reported their quarterly earnings as the talks about the re-  
5 merger continued.[38][39]  
6  
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8 48) On August 13, 2019, CBS and Viacom officially announced their merger; the  
9 combined company was to be named ViacomCBS, with Shari Redstone serving as  
10 chair.[40][41][42] Upon the merger agreement, Viacom and CBS jointly  
11 announced that the transaction is expected to close by the end of 2019, pending  
12 regulatory and shareholder approvals.[42] The merger required approval by the  
13 Federal Trade Commission (FTC).[42]  
14  
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16

17 49) On December 10, 2019, days after the merger, Bakish announced that  
18 ViacomCBS would look to divest Black Rock, the building that held CBS's  
19 headquarters since 1964. He stated, "Black Rock is not an asset we need to own,  
20 and we believe that money would be put to better use elsewhere." [48] On  
21 December 20, 2019, ViacomCBS agreed to acquire a 49% minority stake in film  
22 studio Miramax from beIN Media Group for \$379 million. As part of the purchase,  
23 Paramount Pictures reached a long-term deal for exclusive distribution rights to its  
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1 library, and first-look agreements to co-develop new film and television projects  
2 based on Miramax-owned properties.[49]  
3

4 50) On December 20, 2023, it was reported by Axios and The New York Times that  
5 David Zaslav, CEO of Warner Bros. Discovery, had met with Bob Bakish and had  
6 discussed a possible merger. Spokespeople for the two companies stated that the  
7 talks were preliminary and may not resulted in a deal,[78][79] while Fox Business  
8 reported via internal sources that Zaslav was "not in deal mode".[80]  
9  
10

11 51) On April 2, 2024, Paramount and National Amusements approached Skydance  
12 for an exclusive acquisition window agreement. Shari Redstone and David Ellison  
13 sought a three-way transaction between the companies.[85] On April 18, it was  
14 reported that Sony Pictures was interested in acquiring Paramount Global through  
15 a joint buyout with Apollo.[86][87][88]  
16  
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18

19 52) On April 29, 2024, Bob Bakish stepped down from his role as President and  
20 CEO. He was replaced by an office of the CEO, led by Brian Robbins, George  
21 Cheeks, and Chris McCarthy.[89] The Los Angeles Times characterized this as an  
22 ouster by Redstone due to Bakish's reported opposition of the Skydance deal.[90]  
23 McCarthy was legally designated the company's "interim principal executive  
24 officer" in order to comply with SEC regulations stipulating that one person must  
25  
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conduct "the normal course of business". (See EXHIBIT)

<https://en.wikipedia.org/wiki/Viacom>

53) **Defendant Nickelodeon Group / Nickelodeon Animation Studios:** Upon information and belief, that at all times hereinafter mentioned, the Defendant Nickelodeon Animation Studios (hereinafter "STUDIO") maintains a corporation, animated television studios and transacts substantial business from its location in Burbank, CA.

54) Nickelodeon Group, also known as Nickelodeon Networks Inc., is an American children's entertainment company owned by Paramount Global through its Paramount Media Networks division that oversees cable television channels (including its flagship service Nickelodeon), its in-house animation studio, and Paws, Inc.

55) Games Productions, Inc., [a] d/b/a Nickelodeon Animation Studio (also known as Nickelodeon Animation), is an American animation studio owned by Paramount Global through the Nickelodeon Group. It has created many original television programs for Nickelodeon, such as SpongeBob SquarePants, The Fairly OddParents, Rugrats, Avatar: The Last Airbender and The Loud House, among various others. Since the 2010s, the studio has also produced its own series based on preexisting IP purchased by Paramount Global, such as Teenage Mutant Ninja

1 Turtles and Winx Club. In November 2019, Nickelodeon Animation Studio signed  
2 a multiple-year output deal for Netflix, which will include producing content, in  
3 both new and preexisting IP, for the streaming platform.[3]  
4

5 [https://en.wikipedia.org/wiki/Nickelodeon\\_Animation\\_Studio](https://en.wikipedia.org/wiki/Nickelodeon_Animation_Studio)  
6

7  
8 56) The studio was founded in 1990 under the name Games Productions Inc. A  
9 subsidiary called Games Animation was established in 1992.[4] It oversaw the  
10 production of three animated programs for Nickelodeon: Doug, Rugrats, and The  
11 Ren & Stimpy Show. In 1992, Nickelodeon began work on Games Animation's  
12 first fully in-house series, Rocko's Modern Life. Games Animation produced much  
13 of the network's mid-1990s output in partnership with other animation companies  
14 like Klasky Csupo. In 1998, the studio moved from Studio City, California to  
15 Burbank with the construction of a new facility. It was renamed Nickelodeon  
16 Animation Studio and later Nickelodeon Studios Burbank. In 1999, a second  
17 facility in New York City was opened, named Nickelodeon Animation Studio New  
18 York.[5] (See EXHIBIT)  
19  
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23 57) **Defendant Shari Ellin Redstone:** Shari Ellin Redstone (born April 14, 1954)  
24 is an American businesswoman and media executive.[5] She graduated with a  
25 bachelor's degree from Tufts University in 1975. She later received her J.D. degree  
26 from Boston University School of Law. Redstone practiced corporate law, estate  
27  
28

1 planning and criminal law in the Boston area before joining National Amusements  
2 in 1999.

3  
4 58) In 2011 she became co-founder and managing partner in Advancit Capital LLC  
5 a venture firm for media, technology, and web3 startups.  
6

7  
8 59) She is the non-executive chairwoman of Paramount Global (formerly known as  
9 ViacomCBS) and chairwoman, president and CEO of National Amusements, and a  
10 former vice chair of CBS Corporation[6] and Viacom.[7] Through National  
11 Amusements, Redstone and her family hold majority voting power over Paramount  
12 Global and its subsidiaries – CBS, Comedy Central, BET, Showtime Networks,  
13 Nickelodeon, MTV and the film studio Paramount Pictures.  
14  
15

16 60) In 2020, Redstone was named on Time's list of the 100 most influential people  
17 in the world.[8] In 2023, she ranked 37th in Forbes list of "World's 100 most  
18 powerful women. In August 2019, the Associated Press reported that Shari  
19 Redstone had become the chair of the board for the reuniting of CBS and Viacom  
20 as ViacomCBS, today known as Paramount Global.[29]  
21  
22

23  
24 61) In May 2020, she was named as a defendant in a lawsuit filed by the Bucks  
25 County Retirement Fund and the International Union of Operating Engineers, over  
26 the perceived "destruction of value" caused by the CBS and Viacom merger.[30] In  
27 January 2021, a Delaware judge said former CBS shareholders could sue Shari  
28

1 Redstone for pressuring the company to enter the merger,[31] and in 2022,  
2 Redstone and Viacom sued a group of insurers for refusing to cover legal bills  
3 incurred by the court battle.[32]  
4

5  
6 62) In July 2024, it was announced that Redstone would sell to independent film  
7 studio Skydance Media, founded by film producer David Ellison, her family's  
8 "controlling" interest in Paramount Global, in a merger agreement that would give  
9 birth to a corporation valued approximately \$28 billion.[33]  
10

11 [https://en.wikipedia.org/wiki/Shari\\_Redstone](https://en.wikipedia.org/wiki/Shari_Redstone) (See EXHIBIT)  
12

13 63) **Defendant Robert “Bob” M. Bakish:** Robert Marc Bakish (December 14,  
14 1963) is an American business executive. Bakish earned a Bachelor’s in  
15 Operations in 1985 from Columbia University. Then earned his MBA from  
16 Columbia Business School in 1989. Today Bakish is on the Board of Overseers at  
17 Columbia Business School and on the Board of Visitors at Columbia University’s  
18 School of Engineering and Applied Sciences.  
19  
20  
21

22 64) In February 1997, Bakish joined Viacom. Initially as vice president of planning  
23 and development, he became senior vice president of planning, development and  
24 technology in January 1998.  
25

26  
27 65) In October 1999, he became the executive vice president of planning and  
28 business development of Viacom's subsidiary MTV Networks. From 2001 through



1 2004, he was executive vice president and chief operating officer of advertising  
2 sales at MTV Networks.[11]  
3

4 66) In 2004, he was appointed executive vice president of operations of Viacom,  
5 Inc., and in 2006 he was also appointed executive vice president of Viacom  
6 Enterprises. In these two positions, he was responsible for Viacom's strategic  
7 planning and business development plus oversight of a range of business units  
8 including Famous Music, Famous Players, Viacom Plus sales and information  
9 services and technology, as well as heading Viacom's cross-divisional marketing  
10 council.  
11  
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13

14 67) When MTVNI CEO Bill Roedy resigned in January 2011, Bakish was  
15 promoted to the newly created position of president and CEO of Viacom  
16 International Media Networks (VIMN). This promotion included responsibility for  
17 all Viacom media networks and operations internationally, including MTV,  
18 Nickelodeon, Comedy Central, BET, VH1, VIVA, TMF, Game One and MTV  
19 Tres; plus, oversight of all of Viacom's international TV-related joint ventures,  
20 including Viacom18 in India and ViacomCBS in Korea, as well as channel  
21 ventures with BSkyB in the UK and Foxtel in Australia.  
22  
23  
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26 68) Under his leadership, the Paramount Channel was launched, offering movies  
27 and television shows in Europe, Latin America and Russia. He oversaw the  
28

1 expansion of networks such as Nickelodeon, Comedy Central and Spike to an  
2 increasing number of foreign markets and helped orchestrate the acquisition of  
3 Channel 5 in the UK and Telefe in Argentina. He also oversaw the launch of apps,  
4 including the Viacom Play Plex suite of branded mobile TV apps and the BET  
5 Play direct-to-consumer subscription video-on-demand app for an adult audience.  
6  
7

8 69) In October 2016, Viacom named Bakish as acting president and CEO of  
9 Viacom effective November 15, to replace interim CEO Tom Dooley. He was also  
10 appointed president and CEO of the newly created Viacom Global Entertainment  
11 Group, which combined Viacom International Media Networks (VIMN) with  
12 Viacom's Music and Entertainment group, which includes MTV, Comedy Central,  
13 VH1, Spike TV and Logo TV; two additional networks, TV Land and CMT, also  
14 joined the Global Entertainment Group. Optimistic that Bakish could make good  
15 on his plans to turn Viacom's core U.S. cable networks and its Paramount Pictures  
16 film studio around, the board of directors of Viacom Inc. made Bakish's  
17 appointment as president and CEO permanent on December 12, 2016.  
18  
19  
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23 70) In early 2017, Bakish laid out a five-point plan to return Viacom to producing a  
24 steady profit. This consisted of focusing on Viacom's six flagship brands: BET,  
25 Comedy Central, MTV, Nickelodeon, Nick Jr. and Paramount; revitalizing content  
26 and talent; deepening distributor and advertiser partnerships to drive traditional  
27  
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1 revenue; increasing digital offerings, consumer products and live experiences; and  
2 optimizing and energizing the organization. The strategy also included having  
3 Paramount Pictures develop films and franchises connected to Viacom television  
4 content; additionally, Spike TV would be rebranded as and converted to a broad-  
5 based general entertainment channel, the Paramount Network, in early 2018.  
6  
7

8 71) By the fall of 2017 Bakish had restructured Viacom, replacing executives at  
9 nearly every company, including hiring Jim Gianopulos - formerly chairman and  
10 CEO of 20th Century Fox, as the new chairman and CEO of Paramount  
11 Pictures.[53][54]  
12  
13

14 72) In 2018, Bakish's implementation of his five-point comprehensive strategy was  
15 credited with Viacom's much improved finances and improved company morale  
16 and focus. In 2018, under Bakish's direction and in accordance with his plan to  
17 capture younger and digital markets, Viacom acquired digital platform WhoSay,  
18 internet video conference VidCon, and online television network  
19 AwesomenessTV. In early 2018, Bakish also announced the launch of an official  
20 Viacom streaming service, which will support ads and will include series and  
21 content from Viacom that hasn't been available on other streaming services. In  
22 April 2018, Viacom launched Viacom Digital Studios, which will create new  
23 original content hosted on sites such as Facebook, Twitter and Snapchat. In  
24  
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1 addition, later that June, Bakish announced that Viacom will produce some new  
2 series exclusively for Netflix, beginning with Nickelodeon-related content.  
3

4 73) In September 2018, due largely to his turnaround of Viacom, The Hollywood  
5 Reporter listed Bakish as #20 in its The Hollywood Reporter 100: The Most  
6 Powerful People in Entertainment 2018.  
7

8  
9 74) On February 5, 2019, it was announced by Viacom CEO Bob Bakish that the  
10 [Loud House Movie] would be released on the streaming service Netflix. In 2017  
11 Paramount Global established that “Paramount Pictures was originally going to  
12 release the film [in 2020 through Paramount] but was pulled from its schedule in  
13 2020. Nickelodeon Movies then signed a deal with Netflix to have the film  
14 distributed on their service. Produced by Nickelodeon Movies, with animation  
15 done overseas at Top Draw Animation, it was released worldwide in August 2021  
16 by Netflix.  
17  
18  
19

20  
21 75) Bakish retained the role of CEO when CBS Corporation and Viacom reunited  
22 under a single company to form Paramount Global (then known as ViacomCBS),  
23 which closed on December 4, 2019.  
24

25 76) On April 28, 2024, it was reported that Bakish will be stepping down from his  
26 position as a CEO of Paramount due to the pressure from ongoing talks between  
27 Skydance Media and Paramount. Skydance CEO David Ellison would take over as  
28

1 CEO of Paramount, replacing Bakish. Bakish stepped down the next day.

2 [https://en.wikipedia.org/wiki/Bob\\_Bakish](https://en.wikipedia.org/wiki/Bob_Bakish) (See EXHIBIT)

3  
4 **77) Defendant Jenna Boyd:** “Jenna Boyd has joined Disney Branded Television as  
5 SVP of Development. Reporting to Charlie Andrews, EVP, Live Action and  
6 Unscripted, the former Netflix and Nickelodeon exec will oversee the scripted  
7 series development team.  
8

9  
10 **78)** Tasked with ramping up the division’s multi-camera business as well as finding  
11 Disney+ global tentpoles, Boyd will creatively supervise the production of scripted  
12 pilots for Disney+ and Disney Channel.  
13

14  
15 **79)** Boyd had her own production company, Field Day Entertainment [2020-2023],  
16 and partnered with The Cartel – where she also served as a manager – to develop a  
17 roster of talent and create kids, family and animation content for broadcasters and  
18 streamers.  
19

20  
21 **80)** Prior to that, Boyd was director of Kids & Family Series at Netflix [2017-  
22 2019], where she built and oversaw the company’s original animation and live-  
23 action series slate and creative team focused on kids and family content, including  
24 Alexa & Katie, Julie and the Phantoms, and The Baby-Sitters Club adaptation,  
25 which won a 2022 Children’s & Family Emmy award for Outstanding Children’s  
26 or Family Viewing Series. Boyd held prior roles as chief content officer at  
27  
28



GoldieBlox and SVP of Animation Development at Nickelodeon [2002-2015], where she first began her career in series development, working on Avatar: The Last Airbender.” (<https://deadline.com/2023/10/jenna-boyd-scripted-series-development-disney-branded-television-1235564223/>)

81) Boyd supervised Chris Savino throughout his entry into the Nickelodeon’s “Shorts Program” in 2013 and during the course of the negotiation process between Savino and Nickelodeon Animation Studios from 2013-2015. Boyd had supervisory authority as the acting agent for Nickelodeon as the project, “The Loud House”, was being developed and “greenlit” to premier on Nickelodeon (2016) until her departure in 2015. (See EXHIBIT)

82) **Defendant Christopher M. Savino:** Christopher Mason Savino (born October 2, 1971) is an American writer, comic book artist and former animator. He is well-known as the creator of the animated series The Loud House. Savino has also worked on The Ren & Stimpy Show, Rocko's Modern Life, Dexter's Laboratory, Cow and Chicken, I Am Weasel, The Powerpuff Girls, Samurai Jack, My Gym Partner's a Monkey, Kick Buttowski: Suburban Daredevil, My Little Pony: Friendship Is Magic, Mickey Mouse and Johnny Test.

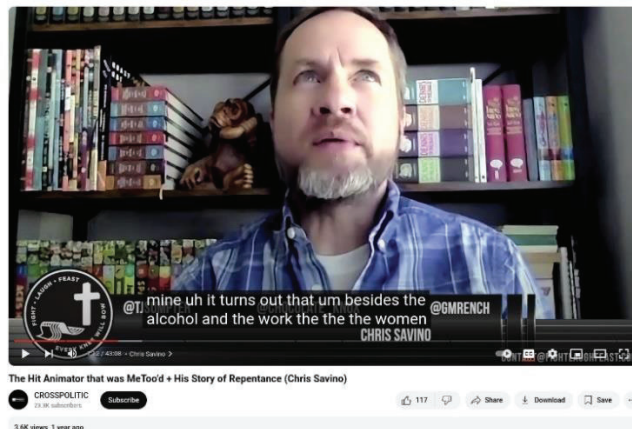
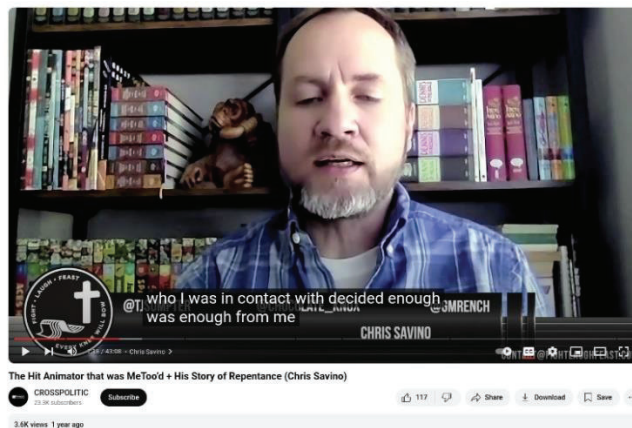
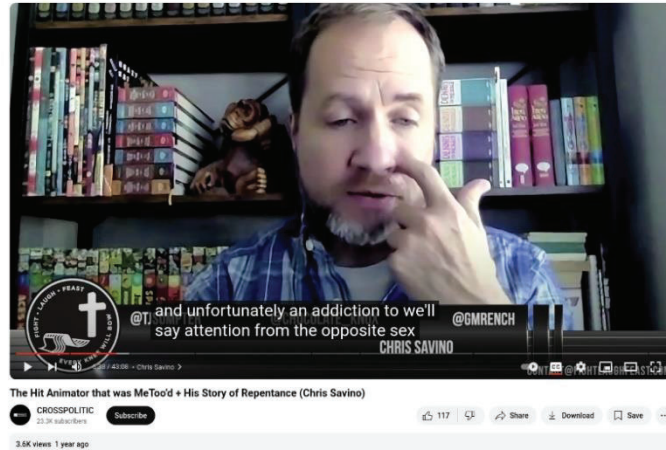
83) Savino has been nominated for three Primetime Emmy Awards, two Annie Awards, and a Daytime Emmy Award. In May 2018, The Animation Guild,

1 IATSE Local 839 gave him a one-year suspension due to sexual harassment  
2 allegations from Nickelodeon (which he was fired from in October 2017), leading  
3 to his animation career being put on halt. Since then, he moved on to literature.  
4

5  
6 84) He began his career in the animation industry in 1991 and has worked for  
7 Spams, Joe Murray Studio, Nickelodeon Animation Studios, Hanna-Barbera,  
8 Cartoon Network Studios and Disney Television Animation. He was originally the  
9 showrunner for the last two seasons of Dexter's Laboratory, The Powerpuff Girls,  
10 Foster's Home for Imaginary Friends and My Gym Partner's a Monkey.[5] He was  
11 also previously a writer for The Grim Adventures of Billy & Mandy, Kick  
12 Butowski: Suburban Daredevil, and Mickey Mouse. In June 2014, his short for  
13 Nickelodeon, The Loud House, was greenlit for a full series, and debuted on May  
14 2, 2016.[6]  
15  
16  
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19 85) On October 17, 2017, Cartoon Brew reported that Nickelodeon had suspended  
20 Savino from their studio due to multiple allegations of sexual harassment against  
21 him; rumors of Savino's inappropriate behavior had existed for "at least a  
22 decade".[8][9] As many as a dozen women accused Savino of sexual harassment,  
23 unwanted sexual advances, and threats of blacklisting female colleagues who no  
24 longer agreed to consensual relationships with him.[8][10] On October 19, a  
25  
26  
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28

Nickelodeon spokesperson confirmed that they fired Savino, and that The Loud House would continue production without him.[10][11]



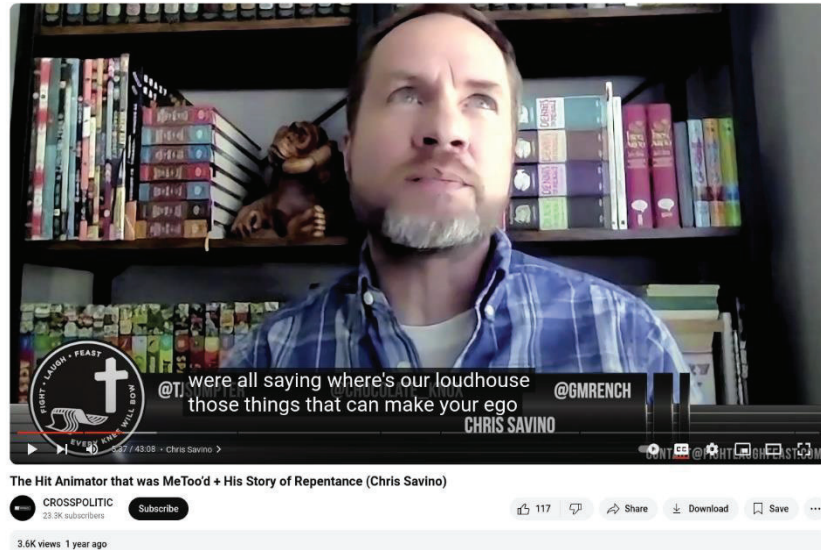
(CrossPolitic: Aug 2023, “The Hit Animator that was MeToo’d + His Story of Repentance (Chris Savino)”)

([https://youtu.be/nnNkwnuEZto?si=Utiinm\\_XItElWaJ0](https://youtu.be/nnNkwnuEZto?si=Utiinm_XItElWaJ0))

86) In October 2019, Savino stated to be a born-again Christian.[15] Since then he has done multiple interviews talking about his repentance and the surrounding circumstances of the sexual harassment accusations. In this interview on CrossPolitics’ podcast released on YouTube in 2023, Savino states that the feeling he got when heard Disney employees talking of his success was enough to make his “Ego explode” and that he was addicted to work, alcohol, sex, and attention from women.







87) On November 1, 2019, Savino released his debut children's novel, Coal: A Cautionary Christmas Tale, through Amazon Publishing. Later in December of the same year he published the first installment of his graphic novel duology Bigfoot & Gray. (See EXHIBIT)



1 88) On March 3, 2020, he published his first non-fiction book, a guide to write  
2 cartoons entitled Writing Cartoons in 4 Acts (Or How I Learned to Stop Worrying  
3 and Love the Midpoint). ([https://en.wikipedia.org/wiki/Chris\\_Savino](https://en.wikipedia.org/wiki/Chris_Savino))  
4

5  
6 89) **Defendant Netflix** - Upon information and belief, that at all times hereinafter  
7 mentioned, the Defendant Netflix (hereinafter "DISTRIBUTION COMPANY") is  
8 a corporation located at Netflix is an American subscription video on-demand  
9 over-the-top streaming service. The service primarily distributes original and  
10 acquired films and television shows from various genres, and it is available  
11 internationally in multiple languages.[6] (<https://en.wikipedia.org/wiki/Netflix>)  
12  
13

14  
15 90) Launched on January 16, 2007, nearly a decade after Netflix, Inc. began its  
16 pioneering DVD-by-mail movie rental service, Netflix is the most-subscribed  
17 video on demand streaming media services, with over 277.7 million paid  
18 memberships in more than 190 countries as of July 2024.[5][7] By 2022, "Netflix  
19 Original" productions accounted for half of its library in the United States and the  
20 namesake company had ventured into other categories, such as video game  
21 publishing of mobile games through its flagship service. As of October 2023,  
22 Netflix is the 23rd most-visited website in the world, with 23.66% of its traffic  
23 coming from the United States, followed by the United Kingdom at 5.84%, and  
24 Brazil at 5.64%.  
25  
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1 91) On January 6, 2010, Netflix agreed with Warner Bros. to delay new release  
2 rentals to 28 days after the DVDs became available for sale, in an attempt to help  
3 studios sell physical copies, and similar deals involving Universal Pictures and  
4 20th Century Fox were reached on April 9.[56][57][58] In July 2010, Netflix  
5 signed a deal to stream movies of Relativity Media.[59] In August 2010, Netflix  
6 reached a five-year deal worth nearly \$1 billion to stream films from Paramount,  
7 Lionsgate and Metro-Goldwyn-Mayer. The deal increased Netflix's annual  
8 spending fees, adding roughly \$200 million per year. It spent \$117 million in the  
9 first six months of 2010 on streaming, up from \$31 million in 2009.[60] On  
10 September 22, 2010, Netflix launched in Canada, its first international  
11 market.[61][62] In November 2010, Netflix began offering a standalone streaming  
12 service separate from DVD rentals.[63]

13  
14  
15  
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18 92) On November 13, 2019, Netflix and Nickelodeon entered into a multi-year  
19 agreement to produce several original animated feature films and television series  
20 based on Nickelodeon's library of characters. This agreement expanded on their  
21 existing relationship, in which new specials based on the past Nickelodeon series  
22 Invader Zim and Rocko's Modern Life (Invader Zim: Enter the Florpus and  
23 Rocko's Modern Life: Static Cling respectively) were released by Netflix. Other  
24 new projects planned under the team-up include a music project featuring  
25 Squidward Tentacles from the animated television series SpongeBob SquarePants,  
26  
27  
28

1 and films based on The Loud House and Rise of the Teenage Mutant Ninja  
2 Turtles.[218][219][220] The agreement with Disney ended in 2019 due to the  
3 launch of Disney+, with its Marvel productions moving exclusively to the service  
4 in 2022.[221][222]

5  
6  
7 93) In November 2019, Netflix announced that it had signed a long-term lease to  
8 save the Paris Theatre, the last single-screen movie theater in Manhattan. The  
9 company oversaw several renovations at the theater, including new seats and a  
10 concession stand.[223][224][225] On March 4, 2020, ViacomCBS announced that  
11 it will be producing two spin-off films based on SpongeBob SquarePants for  
12 Netflix.[228] <https://en.wikipedia.org/wiki/Netflix> (See EXHIBIT)

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15  
16 94) **Defendant British Film Institute:** The British Film Institute (BFI) is a film  
17 and television charitable organization which promotes and preserves filmmaking  
18 and television in the United Kingdom. The BFI uses funds provided by the  
19 National Lottery to encourage film production, distribution, and education. It is  
20 sponsored by the Department for Culture, Media and Sport,[2] and partially funded  
21 under the British Film Institute Act 1949.[3]

22  
23  
24  
25 95) The BFI was established in 1933 to encourage the development of the arts of  
26 film, television and the moving image throughout the United Kingdom, to promote  
27 their use as a record of contemporary life and manners, to promote education about  
28

1 film, television and the moving image generally, and their impact on society, to  
2 promote access to and appreciation of the widest possible range of British and  
3 world cinema and to establish, care for and develop collections reflecting the  
4 moving image history and heritage of the United Kingdom.[4]  
5

6  
7 96) The BFI is currently managed on a day-to-day basis by its chief executive, Ben  
8 Roberts. Supreme decision-making authority rests with a chair and a board of up to  
9 15 governors. The current chair is Jay Hunt, a television executive, who took up  
10 the post in February 2024.[17] Governors, including the Chair, are appointed by  
11 the Secretary of State for Culture, Media and Sport.  
12

13  
14 97) The BFI operates with three sources of income. The largest is public money  
15 allocated by the Department for Culture, Media and Sport. For the year 2021–22,  
16 the BFI received £74.31m from the DCMS as Grant-in-Aid funding.[18] The  
17 second largest source is commercial activity such as receipts from ticket sales at  
18 BFI Southbank or the BFI London IMAX theatre (£5m in 2007), sales of DVDs,  
19 etc. Thirdly, grants and sponsorship of around £5m are obtained from various  
20 sources, including National Lottery funding grants, private sponsors and through  
21 donations (J. Paul Getty, Jr., who died in 2003, left the BFI a legacy of around £1m  
22 in his will). The BFI is also the distributor for all Lottery funds for film (in 2011–  
23 12 this amounted to c.£25m).  
24  
25  
26  
27  
28

- 1 98) As well as its work on film, the BFI also devotes a large amount of its time to  
2 the preservation and study of British television programming and its history. In  
3 2000, it published a high-profile list of the 100 Greatest British Television  
4 Programmes, as voted for by a range of industry figures.[ Wikipedia 2024]  
5  
6  
7 99) Bloomsbury Publishing is British Film Institute's official publishing partner.  
8 The BFI's publishing programme features an unrivaled range of books for film  
9 enthusiasts, scholars, students and practitioners, written by leading scholars and  
10 critics of cinema history and culture.  
11  
12  
13 100) Covering all aspects of cinema and screen studies, it includes the flagship BFI  
14 Film Classics and TV Classics, the unique British Screen Stories using material  
15 from the BFI National Archive, the concise Screen Guides, bestselling introductory  
16 textbooks such as The Cinema Book, and scholarly works including the award-  
17 winning Cultural Histories of Cinema series. (See EXHIBIT)  
18  
19  
20  
21 101) Digital access to British Film Institute books and resources is now available for  
22 institutions on Screen Studies. Discover our BFI Film Studies and BFI Film  
23 Classics collections and get in touch to arrange a trial. Bloomsbury Publishing Inc  
24 Registered Office: 1385 Broadway, Fifth Floor, New York, NY 10018 USA  
25  
26 [https://en.wikipedia.org/wiki/British\\_Film\\_Institute](https://en.wikipedia.org/wiki/British_Film_Institute) (See EXHIBIT)  
27  
28



102) **Defendant TajMania Entertainment:** TajMania Entertainment is a “Socially Conscious Children’s Entertainment Company.” In 2009, Larry Juris formed TajMania Entertainment. It was originally formed as TAJ Productions an animation postproduction company that worked on the Pokémon franchise, animated scripted material, as a voice actor supervisor, in music composition and music production; with credits on shows such as *Casper the Friendly Ghost*, *Deadtime Stories*, *Slayers* and others. The company has promoted three scripts on its social media pages: *Oye Christina*, *Max Helsing*, and *Rescue Dogs*. The Plaintiff has found two addresses listed for the company, which follow here: 4475 Henry Hudson Pkwy, Bronx, New York 10471 and 3950 Blackstone Ave, Bronx, NY 10471. TajMania Entertainment was composed of the following members: Larry Juris, Howard Gimple, Sam Laskey, Tom Caggiano, and Emanuel “Manny” Reyes. (See EXHIBIT)

[https://rocketreach.co/tajmania-entertainment-profile\\_b5f773def42e88de](https://rocketreach.co/tajmania-entertainment-profile_b5f773def42e88de)

[https://www.facebook.com/TajManiaProductions/?locale=nn\\_NO](https://www.facebook.com/TajManiaProductions/?locale=nn_NO)

103) **Defendant Larry Juris:** Larry Juris attended Fairleigh Dickinson University. He was the sole owner of TAJ Productions, an Audio Postproduction Facility with two studios for twenty years. He specialized in dubbing foreign animation and films from foreign languages to English. He was best known for his work on

Pokémon productions including the Pilot episode and most of the movies. He is also well known for his work on *Deadtime Stories*. (See EXHIBIT) <https://www.imdb.com/name/nm0432966/> <https://www.linkedin.com/in/larry-juris-4950717/>

104) **Larry Juris (TAJ Productions), Nickelodeon, and Deadtime Stories:**

*Deadtime Stories* (also known internationally as *Freaky Fairy-Tales* and *The Griebels* from *Deadtime Stories*) is a 1986 American horror comedy anthology film co-written and directed by Jeffery Delman in his directorial debut. In the film, a babysitting uncle tells his nephew three stories. The first story involves a slave used by two witches, who are attempting to resurrect their sister. The second story is based on "Little Red Riding Hood", where a teenage girl mistakenly picks up a werewolf's medicine for her grandmother. The third story, based on "Goldilocks", talks about three escaped mental patients who share their hideaway with a murderess. ([https://en.wikipedia.org/wiki/Deadtime\\_Stories\\_\(film\)](https://en.wikipedia.org/wiki/Deadtime_Stories_(film)))

105) Production was filmed in New York City in 1984, originally titled as *Freaky Fairy Tales*. After screening at the 1986 Cannes Film Festival, it was released on November 26, 1986, where it grossed \$2.7 million at the box office.

106) However, Nickelodeon rereleased *Deadtime Stories* as a television series in 2012. It is described as "an anthology horror-fantasy television series written by

1 Annette Cascone and based on the book series of the same title (created by Annette  
2 and Gina Cascone). It premiered on Nickelodeon on November 2, 2012, and aired  
3 through November 14, 2013.” (See EXHIBIT)

4  
5 [https://en.wikipedia.org/wiki/Deadtime\\_Stories\\_\(TV\\_series\)](https://en.wikipedia.org/wiki/Deadtime_Stories_(TV_series))  
6

7 107) **Defendant Howard Gimple:** (Howard’s Amazon Bio read as follows):

8 “Howard Gimple has been a pen slinger for most of his adult life. He was a writer  
9 at Newsday, the editor of a newsletter for the New York Giants football team and a  
10 copywriter and creative director for several New York ad agencies. He has written  
11 English dialogue for the American releases of Japanese anime cartoons, reviewed  
12 books for the Long Island History Journal and movies for a pay-per-view  
13 television network.  
14  
15  
16

17 108) Howard was Chief Creative Officer at TajMania Entertainment, a film and TV  
18 production company dedicated to creating socially conscious programming. He  
19 wrote ‘The Garbage Man,’ an award-winning documentary about a waste  
20 management executive who helped save the lives of more than 50,000 children  
21 with congenital heart disease.  
22  
23  
24

25 109) Howard was a writer and sports editor for the Stony Brook University alumni  
26 magazine. He also taught two seminars at the university, ‘Rock & Relevance,’  
27 about the political influence of 60’s rock & roll and ‘Filthy Shakespeare,’  
28

1 exploring the dramatic use of sexual puns and innuendos in the Bard's plays and  
2 poems.

3  
4 110) Obviously unable to hold a job for any length of time, Howard turned to writing  
5 novels, where his chances of getting fired are minimal. (See EXHIBIT)

6  
7 111) Howard grew up in Brooklyn, which became cool shortly after he departed. He  
8 now lives in Glendora, California with his wife, Chris and his goldendoodle,  
9 Brinkley.” <https://www.amazon.com/stores/author/B0032UAQL8/about>

10  
11  
12 112) **Defendant Rebecca “Beck” Gimple:** Becky is the Member Services Manager  
13 for National Assistance League, a national organization that supports and trains  
14 120 Assistance League chapters in the US united in purpose and dedicated to  
15 making local lives better.

16  
17  
18 113) Prior to joining Assistance League, Becky most recently worked in the  
19 foundation at Children’s Hospital Los Angeles. She has a Master of Science degree  
20 in Public Relations from Boston University, and a Master of Library and  
21 Information Science degree from San Jose State University. In her spare time, she  
22 is an avid community volunteer, serving as the Immediate Past President of the  
23 Zonta Club of Burbank Area, the President of the Zonta Club of Burbank Area  
24 Foundation, and a Director of Glendale Library, Arts & Culture Trust. She has also  
25 served as a League Advisor for the Junior League of Los Angeles and has  
26  
27  
28

1 volunteered as a Reader for Reading to Kids and a Cat Care Volunteer for the Los  
2 Angeles ASPCA. Becky is passionate about volunteerism and the power of  
3 volunteers to transform their local communities through service.  
4

5 (<https://www.linkedin.com/in/beckygimple/>) (See EXHIBIT)  
6

7 114) Becky graduated from Columbia University's Barnard College with a BA in  
8 English, and later took a summer program at UCLA Anderson School of  
9 Management in film studies titled, "Managing Enterprise in Media, Entertainment,  
10 and Sports (MEMES) Summer Institute". Becky worked for The Walt Disney  
11 Company's Imagineering division from November 2016-February 2019.  
12  
13

14 115) **Defendant Sam Laskey:** Sam is a screenwriter, doting house-husband,  
15 Kentucky "farmboy", lover of weird, trashy Italian movies, and maker of the best  
16 darn homemade gnocchi you've ever tasted.  
17  
18

19 116) Sam received his BA at Columbia University, where he studied film theory and  
20 wrote his thesis on George Romero's Night of the Living Dead. He received his  
21 MFA in Screenwriting from Boston University in 2013. He is a former Film/TV  
22 lecturer at BU's College of Communication where he taught courses Episodic  
23 Drama and Writing the Narrative Short.  
24  
25

26 117) Prior to graduate school, Sam worked for three years for Oscar-winning  
27 producer Scott Rudin (No Country for Old Men, The Social Network) analyzing  
28



1 scripts, novels, and comic books. He just won Screencraft's Comedy Screenplay  
2 Contest. In 2013, he was named "the next up-and-coming student screenwriter" by  
3 Script Pipeline. <https://www.linkedin.com/in/samuellaskey>  
4

5  
6 118) In 2016 Laskey won Screencraft's Comedy contest for his script titled "The  
7 Fake" which helped him land management. Laskey also has IMDB credits for  
8 writing and acting on the following titles, *The Suitor* (2016), *Ick* (2024), and *The*  
9 *Guardians of Justice* (Will Save You!) (2022). Laskey has been credited as  
10 working on Netflix's series *The Guardians of Justice* as Writer-Producer from  
11 2022 onward. (See EXHIBIT)  
12  
13

14  
15 119) **Defendant Tom Caggiano:** Tom Caggiano was educated at New York's  
16 School of Art & Design and Pratt Institute. [He has] continually augmented my  
17 education by taking classes at the School of Visual Arts, Parsons School of Design,  
18 The Society of Illustrators, and the Art Students League.  
19

20  
21 120) Caggiano's oil paintings, watercolors, and drawings have been shown and  
22 published nationally and are displayed in the homes and offices of private  
23 collectors. [His] passion for photography and music, as well as my interest in  
24 psychoanalysis and the unconscious mind, are a recurring theme throughout his  
25 work. [He has] also been a Creative Director for several major advertising agencies  
26 playing an essential role in branding, marketing, and corporate identity. [He is]  
27  
28

1 presently the owner of Caggiano Studios LLC.

2 <https://www.caggianoart.com/whimsical>

3  
4 121) From (2013-2019) he was the Managing Partner at The Factory, LLC. His  
5 works include marketing communication designs, branding, including ads,  
6 collateral pieces, logo design, websites, posters and billboards, design and illustrate  
7 book covers for self-published authors and small presses, dynamic magazine and  
8 newsletter designs, layouts for print and online use, produced award-winning  
9 illustrations for ads, book covers, magazines.  
10  
11

12  
13 122) Caggiano was Creative Director/Production Designer for TajMania  
14 Entertainment from (2012-2016). His responsibilities at TajMania included: Art  
15 Direction, Character Design, Animation Direction, and Web Design. Caggiano also  
16 created book covers for Howard Gimple's murder novels. (See EXHIBIT)  
17  
18

19 123) **Defendant Emanuel "Manny" Reyes:** Is originally from El Salvador where he  
20 attended the Universidad Tecnológica of El Salvador. He is Co-founder and Chief  
21 Marketing Officer of TajMania Entertainment in Queens County, New York.  
22 Reyes was responsible for overseeing all US and international sales, marketing and  
23 promotions (2012-Present). <https://www.linkedin.com/in/manuel-reyes-51300756/>  
24  
25

26  
27 124) In 2015 Reyes had moved to North Carolina and by 2017 he had started Plaza  
28 Fence LLC, a privately owned business. (<https://plazafence.com/>) (See EXHIBIT)

125) **Defendant Darryl “Scott” Haynes:** Darryl Scott Haynes started his education in New York with intention to pursue a degree in Juris Doctor studies but left the field to take work in Facilities and Management. He was a direct supervisor to Plaintiff Alethea O’Toole and Defendant Lucy Magaña at Corovan, as acting agent for The Walt Disney Company. Mr. Haynes was instrumental in solidifying the contract between Corovan and The Walt Disney Company.

126) In addition, Mr. Haynes claims to be a highly skilled and experienced workplace operations and workplace services professional with a proven track record in global facilities operations and corporate real estate. With expertise in space planning, events, warehousing, maintenance, EHS/safety, and support operations. He has successfully managed facilities for a range of companies, from startups to corporate headquarters. His background includes corporate real estate management, office lease management, and space establishment for domestic and international locations. He specializes in creating workplace efficiencies, streamlining service processes, and managing vendor relationships. As well as business planning and strategy, financial analysis, and employee engagement.

127) Mr. Haynes most recent role as Sr. Director of Global Facilities Operations at Leaf Group, managed multiple offices and international locations, revamped facilities processes for cost efficiency, and ensured workplace safety amid the

1 evolving pandemic. At Dollar Shave Club, he reduced operational expenses by  
2 \$3.1M through innovative directives, space planning, and vendor management. At  
3 Leaf Group he was able to reduce operational expenses by 20% by vendor  
4 management, revamping tumbling, HVAC, and other maintenance programs.  
5 Additionally, his experience includes managing facilities for renowned  
6 organizations like Walt Disney Studios, Metacloud (acquired by Cisco), and Canon  
7 Business Process Services at Amgen laboratories in Thousand Oaks. (See  
8 EXHIBIT)

128) He is proficient in strategic sourcing, vendor management, and relationship  
14 building. His skills also include managing budgets, overseeing capital  
15 improvement projects, and participating in M&A due diligence teams. With Six  
16 Sigma certification, IFMA courses, and LEED certification in progress, he offers a  
17 unique blend of skills and expertise to optimize facilities operations. He is a  
18 member of IFMA, fluent in MS Office, Google Suite, Envoy, and CAD. He has  
19 rolled out and managed most office space, security, and mail management  
20 programs. He also possesses construction and import/export experience.

24 129) In addition, he is a member of Lower Depths Theatre, with his wife, where he  
25 has participated in yearly activities since 2017 and supports his wife in studying  
26 out Honor Killing and sex trafficking. <https://www.linkedin.com/in/d-scott-haynes/>  
27

130) **Defendant Tureka Tara Turk-Haynes:** Tureka Tara Turk-Haynes is a writer whose work has appeared at the Hip Hop Theater Festival, the Actor's Studio, EST, and the Kennedy Center. She graduated from Eugene Lang at The New School for her BA and Sarah Lawrence with her M.F.A., receiving the Lipkin Playwrighting Award, was a Van Lier Fellow at New York Theatre Workshop, completed the Cosby Screenwriting Program and the Producers Guild Diversity Workshop. She was an emerging playwright at The Underwood Theater reading series, along with Julia Cho, Theresa Rebeck, and Rinne Groff. She won Best Screenplay at African American Women in Cinema and was an Urbanworld Screenplay Finalist. She co-produced the webseries "Dinner at Lola," featuring Tracie Thomas, Yvette Nicole Brown, Bryan Fuller and Nelson Ellis among others. She was published in Obsidian Call & Response: Experiments in Joy. Her fiction has appeared in the international anthology "X:24", African Voices and Stress magazine. She has just finished a novel and a TV pilot on the Harlem Renaissance. She is a founding member of the producing playwrights' collective The Temblors, and member of Lower Depths Theater where she was commissioned to study out Honor Killing in 2019 and was involved in the study of sex trafficking since 2017. (See EXHIBIT)

131) Mrs. Haynes claims to have over 18 years of experience in talent acquisition, employee engagement, and Diversity, Equity, and Inclusion - most recently as a



Vice President of Diversity, Equity, and Inclusion (DEI) at Leaf Group previously owned by Graham Holdings (parent to the Washington Post). Previous to that she worked at Variety Magazine from 2010-2013, Cisco Metacloud 2103-2016, Ticketmaster from 2005-2010, as an assistant at Universal, AOL, the Sundance Channel and as an intern at Penguin Putnam publishers (parent to Penguin Random House) as a second assistant in 1999. Mrs. Haynes has been previously recognized by prestigious organizations like Untapped, Los Angeles Business Journal, and Braverly.

<https://www.lower-depth.com/cycle-of-violence>

<https://www.broadwayworld.com/los-angeles/article/Lower-Depth-Theatre-Ensemble-Announces-Playwright-T-Tara-Turk-Haynes-To-Write-Next-Play-In-Commission-Series-20190425>

<https://www.hrexchangenetwork.com/events-diversity-and-inclusion/speakers/tara-turk-haynes>

132) **Defendant Variety Magazine:** Variety is an American magazine owned by Penske Media Corporation. It was founded by Sime Silverman in New York City in 1905 as a weekly newspaper reporting on theater and vaudeville. In 1933, Daily Variety was launched, based in Los Angeles, to cover the motion-picture industry.

Variety's website features entertainment news, reviews, box office results, plus a credits database, production charts and film calendar.

133) In late 2008, Variety moved its Los Angeles offices to 5900 Wilshire, a 31-story office building on Wilshire Boulevard in the Miracle Mile area.[70][71] The building was dubbed the Variety Building because a red, illuminated "Variety" sign graced the top of the building.[70] (See EXHIBIT)

134) In 2013, PMC, the parent company of Variety, announced plans to move Variety's offices to their new corporate headquarters at 11175 Santa Monica Blvd. in Westwood.[70] There, Variety shares the 9-story building with parent company PMC, Variety Intelligence Platform, and PMC's other media brands, including Deadline.com, Rolling Stone, Vibe, Billboard, Robb Report and the West Coast offices of WWD and Footwear News.[72] 11175 Santa Monica Boulevard, Los Angeles, California, U.S. [https://en.wikipedia.org/wiki/Variety\\_\(magazine\)](https://en.wikipedia.org/wiki/Variety_(magazine))

135) **Defendant Lucy Magaña:** Lucy Magaña is Project Manager for Cor-O-Van and contracted to work at Disneyland Resort by The Walt Disney Company. Magaña started in 2010 or 2011 and is currently still employed with the company. Magaña was a co-worker of the following litigants: Plaintiff Alethea O'Toole, Defendant Scott Haynes, Defendant Chris Savino, and Defendant Beck Gimple.

1 136) Lucy Magaña claims to have a four-year Bachelor Degree in Business

2 Administration from Pasadena City College. (See EXHIBIT)

3 (<https://pasadena.edu/academics/divisions/business/business-administration.php>)

4 (<https://www.linkedin.com/in/lucy-Magaña-2a40bb75/>)

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6  
7 137) **Defendant Guillermo Argueta:** Guillermo Argueta attended Skyline College

8 in San Bruno, CA. He went on to become Regional Transportation Manager at

9 Corovan. He was the acting agent for Corovan that contracted with The Walt

10 Disney Company under the guidance of D. Scott Haynes. Argueta started at

11 Corovan in 1993 and still works there today. He supervised his brother Carlos

12 Velasco, Lucy Magaña, Alethea O'Toole and reported to D. Scott Haynes.

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15  
16 138) **Defendant Carlos Velasco:** Carlos Velasco has over 15+ years of experience

17 in facilities operational management and developed a broad knowledge in

18 operation/transportation management, project management, support service in all

19 facets of space planning, move management and janitorial functions as well as a

20 strong knowledge of all furniture related product installation and maintenance.

21 <https://www.linkedin.com/in/carlos-velasco-751308183/> (See EXHIBIT)

22  
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25 139) He was the on-site Manager of Corovan's Walt Disney contract and direct

26 supervisor to Alethea O'Toole and Lucy Magaña from their time of hire till 2012.

27 In 2012 he replaced Mr. Haynes as the Facilities Manager at The Walt Disney

1 Company till 2016. Between 2012-2016 Velasco had two suits filed against him  
2 for sexual harassment and inappropriate behavior to employees.  
3

4 **140) Defendant Sgt. Rebecca Gomez (Individual):** Sergeant Rebecca Gomez is an  
5 experienced law enforcement professional, currently serving as a Patrol Sergeant  
6 with the San Gabriel Police Department. Skilled in supervision, investigations,  
7 Emergency Management, Community Policing, and Public Speaking. Gomez  
8 attended Rio Hondo College from 2007-2008 in the Police Academy-Class #187,  
9 and received a Master's degree, American/U.S. Law/Legal Studies/Jurisprudence  
10 from Pepperdine Caruso School of Law in 2020. She is President of San Gabriel  
11 Valley Peace Officers Association, and formally Vice President of San Gabriel  
12 Police Management Group. She was also named in a lawsuit by fellow Police  
13 Officers for harassment. [https://asamnews.com/2017/12/20/asian-american-police-](https://asamnews.com/2017/12/20/asian-american-police-officer-accused-of-harassment/)  
14 [officer-accused-of-harassment/](https://asamnews.com/2017/12/20/asian-american-police-officer-accused-of-harassment/) (See EXHIBIT)  
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20 **141) Defendant Sgt. Jeffery Whitney (Individual):** Sergeant Jeff Whitney, retired  
21 after 30 years of service with the San Gabriel Police Department. He was partner to  
22 Rebecca Gomez and was also named in the same lawsuit for harassment.  
23 [https://mynews1a.com/crime/2021/01/15/san-gabriel-reaches-settlement-in-asian-](https://mynews1a.com/crime/2021/01/15/san-gabriel-reaches-settlement-in-asian-officers-discrimination-suit/)  
24 [officers-discrimination-suit/](https://mynews1a.com/crime/2021/01/15/san-gabriel-reaches-settlement-in-asian-officers-discrimination-suit/) (See EXHIBIT)  
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142) **Defendant Chief Eugene Harris (Individual):** Eugene Harris was appointed as Pasadena, California's police chief, effective Jan. 3, 2023.

143) Chief Harris has served as the police chief for the City of San Gabriel since 2016. He also serves as president of the Los Angeles County Police Chiefs' Association, actively engaging in advancing the science and art of police administration and crime prevention. In this role, he is also involved in developing, teaching and disseminating best practices across numerous agencies.

144) Chief Harris brings nearly 30 years of law enforcement and leadership experience to Pasadena, with a proven track record of community engagement and personnel development, strategic budget management, and the use of new law enforcement technology. (See EXHIBIT)

145) Chief Harris was supervisor over Sergeant Jeff Whitney and Sergeant Rebecca Gomez. Since his post as Chief, he has been investigated for sexual harassment and has been at the heart of several new lawsuits. One lawsuit included a filing by the Police Union who had concerns about misappropriation of funds, and another by a fellow officer claiming the force is instituting "police gangs" filed in 2023.

<https://www.cityofpasadena.net/police/personnel/gene-harris/>



<https://www.sgvtribune.com/2012/03/13/san-gabriel-council-denies-poa-allegations-at-council-meeting/>

<https://www.sgvtribune.com/2019/11/26/da-looking-into-sexual-misconduct-claims-against-san-gabriel-police-chief-even-after-city-cleared-him/>

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#### IV. STATEMENT OF FACTS

“That light we see is burning in my hall. How far that little candle throws his beams!  
So shines a good deed in a naughty world. So doth the greater glory dims the less.”

~ Portia, William Shakespeare, The Merchant of Venice

146) This is a filing for infringements that occurred onto the PLAINTIFF by the DEFENDANTS in concurrent actions and is right by the court under federal jurisdiction under the United States Constitution Copyright Act of 1976 Title 17, The Digital Millennium Copyright Act of 1998 which includes the WIPO Copyright and Performances and Phonograms Treaties Implementation Act of 1998, and injunction relief where Online Copyright Infringement Liability Limitation may exist.

147) The statement of facts that proceeds herein the written complaint by which the PLAINTIFF brings the complaint to the court and the circumstances that led to the infringement by actual infringers, contributory infringers, vicarious infringers, coconspirators, and Does. These actions took place through means of breach of contract, fraud, deceit, coercion, extortion, patterns of racketeering and other means that led to money laundering by way of illegal copyright infringements on behalf of the National Amusements parent company to Paramount Global/ViacomCBS d.b.a Nickelodeon Animation Studios et al.

## Copyright Infringement #1

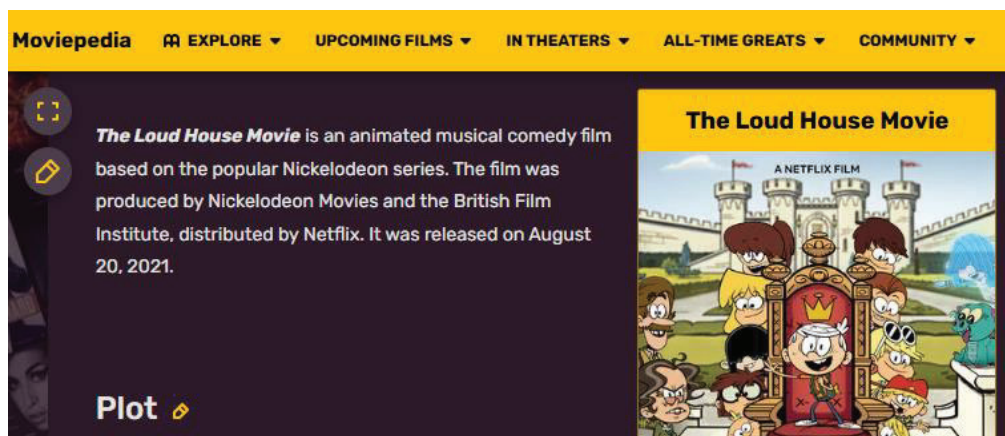
148) ***The Loud House Movie 2021***: On August 20, 2021, *The Loud House Movie* was released through Netflix by Paramount Global, and Nickelodeon in conjunction with ViacomCBS. “On March 28, 2017, Paramount Pictures' president Marc Evans announced a film based on the series originally set for release on February 7, 2020, in cinemas. However, in January 2019, Paramount removed the film from their schedule. On February 5, 2019, [Bob Bakish] announced that the film would instead be produced for release on the streaming service Netflix. On April 30, 2019, it was announced the movie will be released sometime in 2021. On June 20, 2019, Kevin Sullivan stated he completed a draft of the film. On January 12, 2021, it was reconfirmed that the film would release on Netflix within the year, with the film's plot focusing “on the Loud family traveling to Scotland.”

([https://paramount.fandom.com/wiki/The\\_Loud\\_House](https://paramount.fandom.com/wiki/The_Loud_House))

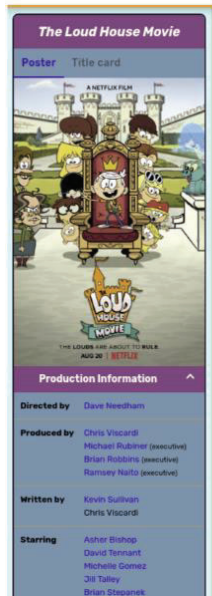
149) **March 28th, 2017**: Fandom has published statements on the Production History of the *Loud House Movie*, referencing various other publications that released statements by DEFENDANTS listed herein. Fandom brings to the reader's attention that *The Loud House Movie* “is the first Nickelodeon Movies production to be released exclusively for streaming,” and packaged by Netflix, thus does not carry the Paramount logo or a Motion Picture Association of America rating

(MPAA). Fandom, “a wiki hosting service that hosts wikis mainly on entertainment topics,” has published statements that go on to say that Savino disagreed with the decision to add dragons to the film, and points to the movie’s storyline being in similarity to the episode “Making a Case” (Season 1: Episode 2B) released May 3, 2016 in Nickelodeon’s series version of *The Loud House* cartoon.

150) The movie was originally indicated to have an entirely different plot derivative altogether, ending with the Louds’ house exploding. Further statements by DEFENDANT Chirs Savino say he “approved of the idea,” and uses the terms “envisioning”, “intent” and “introduction to the show’s universe” to describe elements within the *Loud House*. These intentional “introductions” in development of theme, characters, style, settings, plots, pace, sequence, storylines and over all concept and/or feel took place over a five-year period while developing the movie, and were realized by the STUDIO, COMPANY, and DEFENDANTS herein, for monetary gain.



## 151) Production History of the film



## Production History

- 2017 → On March 28, 2017, Paramount announced that it should be released by February 7, 2020.<sup>[3]</sup> However, it was later reported that the film was not being worked on by Paramount at the time and would likely be released later than expected.<sup>[3]</sup>
- 2019 →
  - On January 18, 2019, it was announced that the film had been pulled from its schedule.<sup>[4]</sup>
  - On February 5, 2019, it was announced by then-Viacom CEO Bob Bakish that the film would instead be released on the streaming service Netflix.<sup>[5]</sup>
  - On April 30, 2019, it was announced that the movie will premiere sometime during 2021.<sup>[6]</sup>
  - On June 20, 2019, Kevin Sullivan completed a draft of the movie.
- 2021 →
  - On January 4, 2021, Kevin Sullivan confirmed that the film is aiming for an April 2021 release.<sup>[7]</sup>
  - On April 27, 2021, a trailer for the film was released, announcing that the film would be released in the summer of 2021.
  - On June 11, 2021, another short trailer was released, confirming the film's release date to be August 20, 2021.

- This is the first Nickelodeon Movies production to be released exclusively for streaming.
  - Because the film was released on a streaming service/not given a theatrical release, this is thus the first film made by Nickelodeon Movies to not have the Paramount logo, as well as their first film to not be given an MPAA rating.

- The animation for this film was provided by the Philippines-based animation studio [Top Draw Animation](#). The reason why they did the animation for the film was because [Jam Filled Entertainment](#) (the show's main animation studio) was too preoccupied working on other projects.<sup>[citation needed]</sup>

- This is the first piece of *Loud House* media to be [dubbed](#) in Hindi and Ukrainian, despite the fact that its [parent series](#) was not dubbed in said languages at the time of its release.

- [Chris Savino](#) originally intended to produce an episode of the series where the Louds would travel to Scotland to meet their relatives, then known as the McLOUDs. Although he approved of this idea carrying over into the movie, he disagrees with the inclusion of fantasy elements (such as dragons) that the film introduced to the show's universe.<sup>[12]</sup>
  - His original envisioning for the film, meanwhile, did *not* involve the Louds leaving Royal Woods; it was meant to take place mostly at their house. There was also supposed to be a scene where the Loud house exploded.



- The film uses the new Nickelodeon Movies logo first introduced in *The SpongeBob Movie: Sponge on the Run*.
- Although Chris Savino stated at Comic-Con 2017 that the events of the film will be separate from the series, Dave Needham, the film's director, overruled his statement and confirmed that the film *is* canon to the series, as it is chronologically set between *Season 4* and *Season 5*, since Lily is in her previous design. However, he is uncertain whether or not the show will acknowledge the events of the film in a future episode.<sup>[8]</sup>
  - While Lynn Sr. and Rita's first meeting at a crosswalk *is* referenced in the song "Right Where We Belong" from the *Season 6* episode "Save Royal Woods!", this is not an explicit reference to the film, as that sequence was previously shown in the *Season 2* episode "L Is for Love" as well.
  - Dave Needham elaborates in an interview on the Nerds Social Club Podcast that the film takes place during the summer following the events of "Coupe Dreams".<sup>[9]</sup>

- The setup of the film is similar to the setup of "Making the Case", as they both involve Lincoln realizing that he has nothing to show while his ten sisters are all beloved because of some sort of achievement or accomplishment.

#### *The Loud House Movie:*

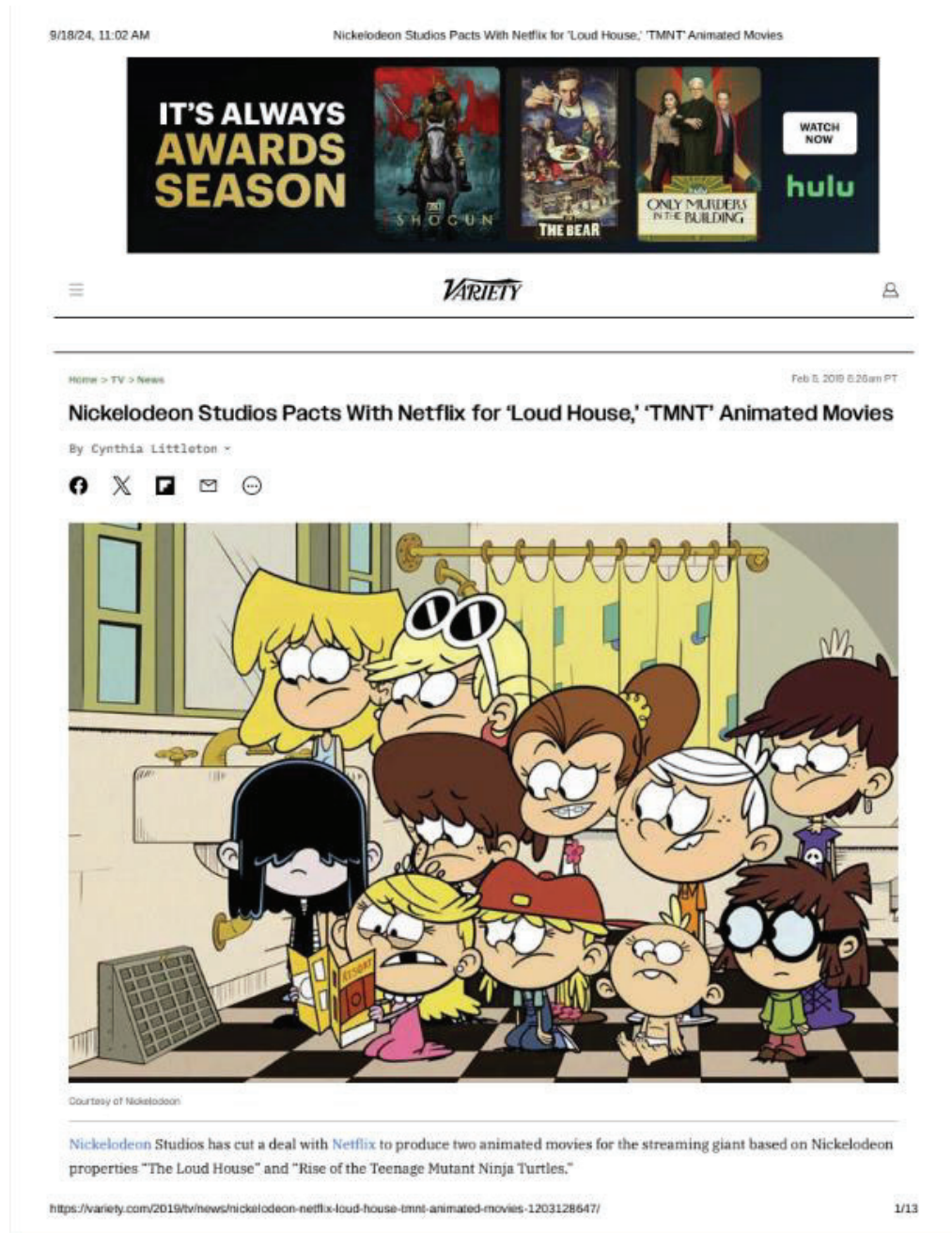
- According to [this Deadline article from March 2017](#)<sup>[10]</sup>, there were plans for *The Loud House Movie* to be released theatrically in February 2020. In April 2018, [the movie was postponed](#)<sup>[11]</sup>. In January 2019, following several recent failures including *Monster Trucks* and *Sherlock Gnomes* as well as observing the poor performance of rival studio Warner Bros.' own *Teen Titans Go! To the Movies*, Paramount [pulled the movie from its release schedule](#)<sup>[12]</sup>. A month later, [it was confirmed](#)<sup>[13]</sup> that the movie would be released on Netflix.
- The film originally was going to have an entirely different plot, mostly being set in the titular house, with series creator Chris Savino directing. The film also was going to be *non-canon* to the series' timeline.
- The film also had a scene where the titular house explodes.

<https://tvtropes.org/pmwiki/pmwiki.php/WhatCouldHaveBeen/TheLoudHouse>

152) **February 5th, 2019 - Variety Magazine:** February 5th, 2019, Variety Magazine publishes a statement by Bob Bakish on behalf of the COMPANY, the STUDIO, and DEFENDANTS regarding changes to the production and distribution of *The Loud House Movie*. The following was printed in Variety that



day: “Nickelodeon Studios has cut a deal with Netflix to produce two animated movies for the streaming giant based on Nickelodeon properties ‘The Loud House’...” <https://variety.com/2019/tv/news/nickelodeon-netflix-loud-house-tmnt-animated-movies-1203128647/>)



9/18/24, 11:02 AM

Nickelodeon Studios Pacts With Netflix for 'Loud House,' 'TMNT' Animated Movies

The pact was unveiled Tuesday morning during Viacom's fiscal first quarter earnings call. Viacom CEO Bob Bakish cited the deal as a sign of Viacom expanded beyond its own channels to deliver content, and he billed the movies on Netflix as strong promotion that should drive viewing of the existing "Loud House" and "TMNT" series airing on Viacom's channels.

Nickelodeon Studios already produces the animated series "Pinky Malinky" for Netflix and it is at work on the live-action series "Avatar: The Last Airbender."

The Netflix deal was a highlight in an otherwise tough quarter for Nickelodeon, which is a big driver of revenue for Viacom's media networks division. Viacom executives projected Nickelodeon would deliver modest growth in the current quarter.

"We do see the light at the end of the tunnel starting to appear," Bakish said.

153) **Netflix and Nickelodeon November 14th, 2019:** November 14th, 2019, Nickelodeon publishes statement of multi-year deal for Netflix to Produce "original animated feature films...based both on the Nickelodeon library of characters as well as all-new IP."

Thursday, November 14, 2019

Netflix and Nickelodeon Form Multi-Year Output Deal to Produce Original Animated Films and Series

Original Netflix and Nickelodeon Press Release:

**NETFLIX AND NICKELODEON FORM MULTI-YEAR OUTPUT  
DEAL TO PRODUCE ORIGINAL ANIMATED FILMS AND SERIES  
FOR KIDS & FAMILIES AROUND THE WORLD**

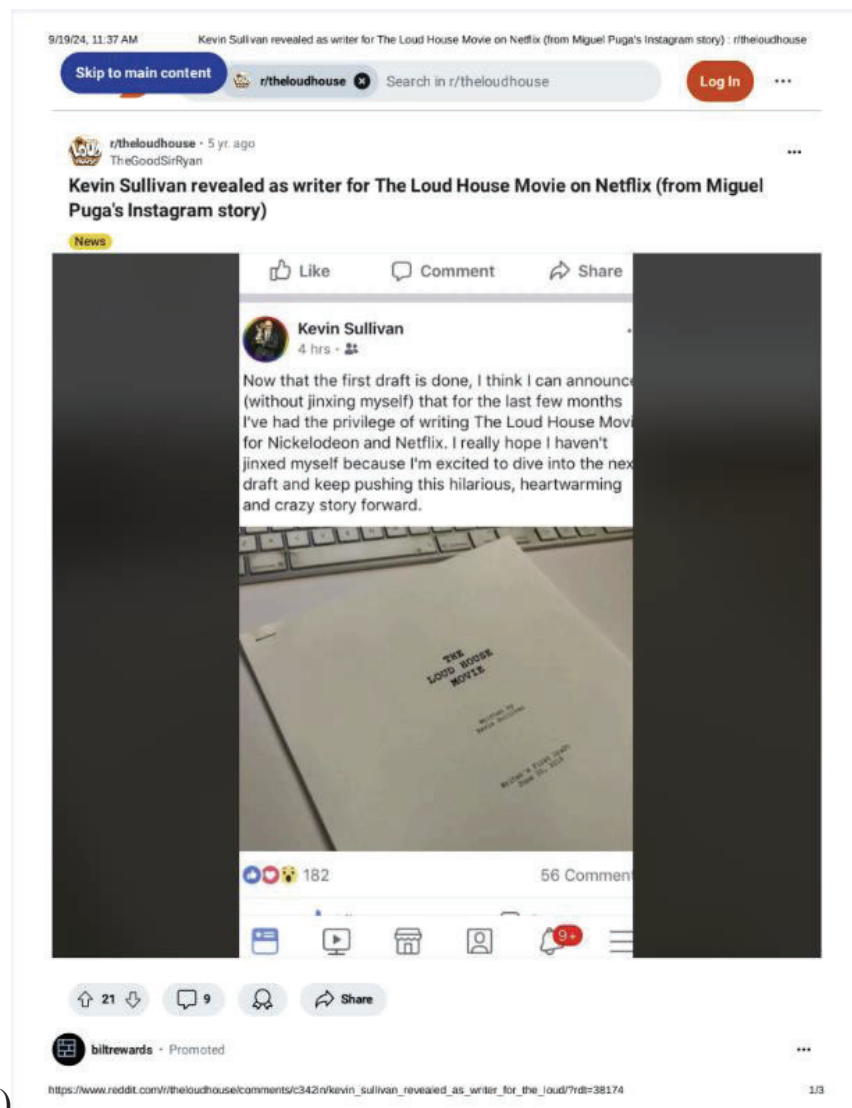


Hollywood, Calif. - November 13, 2019 - Netflix and Nickelodeon today announced that they have formed a new, multi-year output deal to produce original animated feature films and television series - based both on the Nickelodeon library of characters as well as all-new IP - for kids and families around the world. This marks an expansion of the existing relationship between the companies, which has already brought several popular titles to Netflix, including animated specials *Rocko's Modern Life: Static Cling* and *Invader Zim: Enter the Florpus*. Also forthcoming are specials based on *The Loud House* and *Rise of the Teenage Mutant Ninja Turtles*.

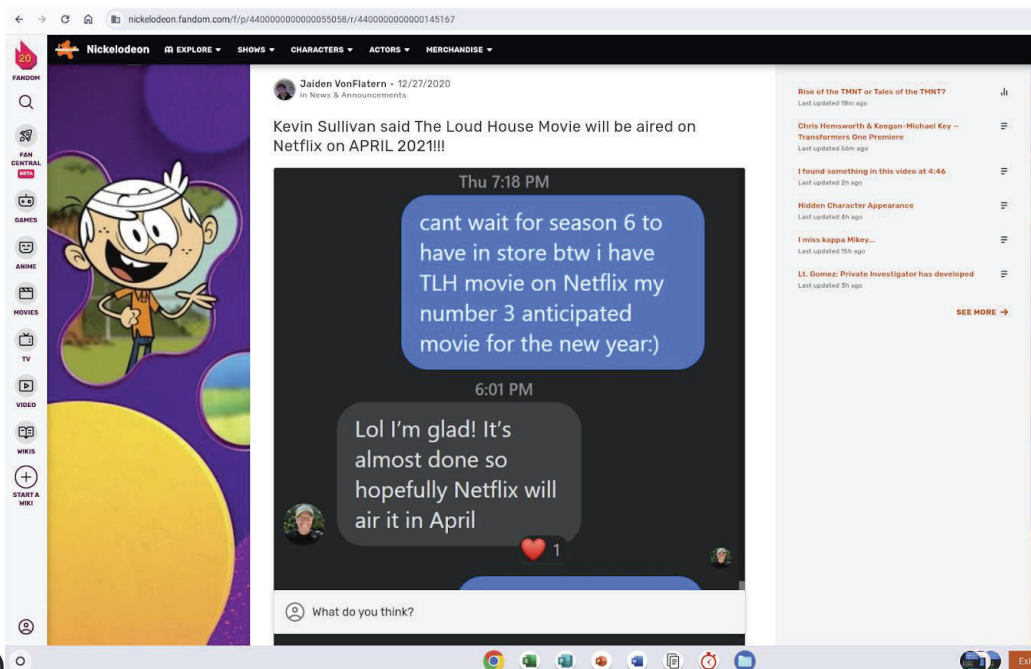
"Nickelodeon has generated scores of characters that kids love, and we look forward to telling wholly original stories that re-imagine and expand on the worlds they inhabit," said Netflix vice president of original animation, Melissa Cobb. "We're thrilled to continue collaborating with Brian Robbins, Ramsey Naito, and the creative team at Nickelodeon in new ways as we look to find fresh voices and bring bold stories to our global audience on

(<https://www.nickalive.net/2019/11/netflix-and-nickelodeon-form-multi-year.html>)

154) **May 4th, 2019, Kevin Sullivan Writer for *The Loud House Movie*:** May 4th, 2019, Kevin Sullivan writer on *The Loud House Movie* wins Emmy for the STUDIO'S, *The Loud House* series. In June 2019 Sullivan posted a picture of his first draft of the film. On December 27th, 2020, a statement by Sullivan was published on Fandom that Netflix may have the film ready for release by April 2021.



a)





155) **March 11th, 2021-Netflix Publishes Statement on *Loud House Movie*:**

March 11th, 2021 NickAlive! publishes statement by Netflix and Kevin Sullivan on the plot of the movie and a potential release date of April 2021, “A release date for *The Loud House Movie* is still to be announced, however, Kevin Sullivan, the new head writer of *The Loud House* in season 5, recently revealed that Netflix aiming to release the film in April 2021.”

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Thursday, March 11, 2021

### Netflix Reveals 'The Loud House Movie' Plot, First Look

Netflix has unveiled the storyline of *The Loud House Movie*!



In the animated movie based on Nickelodeon's hit animated series, the biggest family on television goes on the biggest Loud family vacation ever! The adventure follows the Loud family to Scotland where they discover that they are descendants of Scottish royalty. The family quickly indulges in the most wish-fulfilling high-life ever when they discover their ancestral home is a castle. The pic is directed by Dave Needham.

Director: Dave Needham | Writers: Kevin Sullivan, Chris Viscardi | Produced By: Nickelodeon

Voice Cast: Asher Bishop, Michelle Gomez, David Tennant, Grey Griffin, Jill Talley, Brian Stepanek, Jessica DiCicco, Liliana Mumy, Cristina Pucelli, Nika Futterman, Lara Jill Miller, Andre Robinson, Cat Taber, Katy Townsend, Carlos PenaVega, Izabella Alvarez.

A release date for *The Loud House Movie* is still to be announced, however, Kevin Sullivan, the new head writer of *The Loud House* in season 5, recently revealed that Netflix aiming to release the film in April 2021.

<https://www.nickalive.net/2021/01/netflix-reveals-loud-house-movie-plot.html>

156) **April 27th, 2021 - Netflix Releases Trailer for *Loud House Movie*:** On April 27th, 2021 Netflix releases the trailer for the movie:



157) **May 14th, 2021:** Netflix releases information for publication used in statements in an article by *What's on Netflix* about *The Loud House Movie's* release date for summer 2021. "The Nickelodeon and Netflix production *The Loud House Movie* is finally set to release on Netflix over the course of the summer 2021."



9/19/24, 12:05 PM "The Loud House Movie": Netflix Release Date & What We Know So Far - What's on Netflix


## What's on Netflix

GEEKED WEEK 24 September 16th to 19th >

Netflix News and Previews

### "The Loud House Movie": Netflix Release Date & What We Know So Far

Kasey Moore · X @kasey\_\_moore May 14th, 2021 · 9:49 am ET



The Loud House Movie - Picture: Nickelodeon/Netflix

The Nickelodeon and Netflix production *The Loud House Movie* is finally set to release on Netflix over the course of Summer 2021. Here's everything you need to know about the feature film so far.

The feature film is just one of four Netflix has acquired in the past few years from Nickelodeon. The first two released in 2019 with two more set to release in 2021 with one of which being *The Loud House Movie*.

Let's quickly recap the development of this movie as it's been known in some form since March 2017. In that initial announcement, *The Loud House Movie* was one of many movies announced and was originally planned for February 7th, 2020. It was around a year before the movie was due to release that Netflix announced it had picked up the movie.

<https://www.whats-on-netflix.com/news/the-loud-house-movie-netflix-release-date-what-we-know-so-far/>

1/8

Low, Death & Robots Vol. 2  
Episode 1: Automated  
Customer Service Ending Explained

New Documentaries on Netflix  
in May 2021

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new Netflix releases  
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2024 Netflix Release Schedule →

2025 Netflix Release Schedule →

Latest from What's on Netflix

COMING SOON TO NETFLIX

<https://www.whats-on-netflix.com/news/the-loud-house-movie-netflix-release-date-what-we-know-so-far/>

158) **June 13th, 2021 - NickAlive! Announces Netflix Premiere: NickAlive!**

publishes a statement confirming Netflix release date for *The Loud House Movie* as August 20, 2021. In the article they publish the following new trailer:

The animated clip shows Lincoln Loud appearing on the stairs of his family's ancestral home in Scotland, dressed in a regal costume and telling his family that he's "Duking." His siblings jokingly reply, "Right in front of us? You know we have our own bathrooms now!"

The clip, which introduces a dragon pet, ends with Lincoln advising his family to "get on board" with his new royal ways, before being hit by a slamming door while trying to make a grand exit.

In Nickelodeon's much-anticipated *The Loud House Movie*, based on Nickelodeon's hit animated series *The Loud House*, the biggest family on television goes on the biggest Loud family vacation ever! The adventure follows the Loud family to Scotland where they discover that they are descendants of Scottish royalty. The family quickly indulges in the most wish-fulfilling high-life ever when they discover their ancestral home is a castle.



Director Dave Needham (head of story, *Smallfoot*) and writers Kevin Sullivan and Chris Viscardi planned this hilarious family trip, which features the voices of Asher Bishop, Michelle Gomez (Morag), David Tennant, Grey Griffin, Jill Talley, Brian Stepanek, Jessica DiCicco, Liliana Mumy, Cristina Pucelli, Nika Futterman, Lara Jill Miller, Andre Robinson, Cat Taber, Katy Townsend, Carlos PenaVega and Izabella Alvarez. Produced by Nickelodeon Animation Studios.

<https://www.nickalive.net/2021/06/netflix-to-premiere-loud-house-movie-on.html>

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159) **August 20th, 2021 - Netflix Premieres *The Loud House Movie*:** On August 20th, 2021, Netflix releases the film on their worldwide streaming platform. The Movie is still available for streaming today.



### The Loud House

Watch trailers & learn more.



### Watch The Loud House Movie | Netflix Official Site

With his parents and all 10 sisters in tow, Lincoln Loud heads to Scotland and learns that royalty runs in the family in this global musical journey!

<https://www.netflix.com/title/81068804>



### The Loud House Movie Official Trailer! | Goodbye Loud House ...



Goodbye Loud House, hello Loud Castle The Loud House Movie is coming to Netflix on Aug 20.

[https://www.facebook.com/nickelodeon/videos/the-loud-house-movie-official-trailer/787537158577962/?\\_rdr](https://www.facebook.com/nickelodeon/videos/the-loud-house-movie-official-trailer/787537158577962/?_rdr)



### The Loud House Movie

Netflix's The Loud House Movie Official Trailer #2.  
Gallery · Script · Schooled!

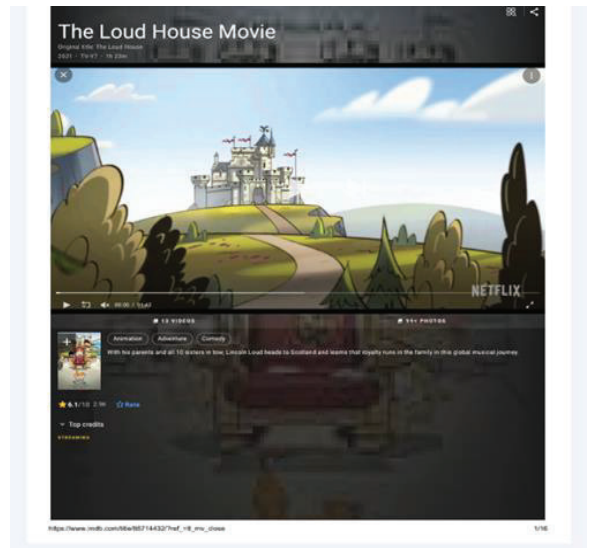
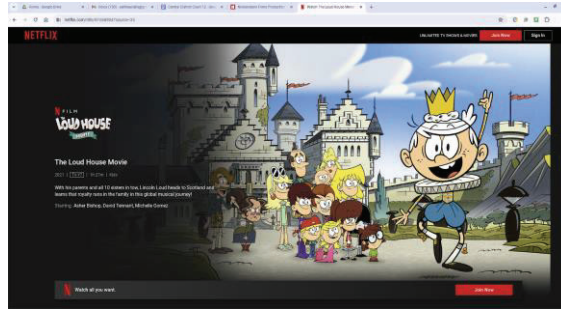


[https://theloudhouse.fandom.com/wiki/The\\_Loud\\_House\\_Movie](https://theloudhouse.fandom.com/wiki/The_Loud_House_Movie)

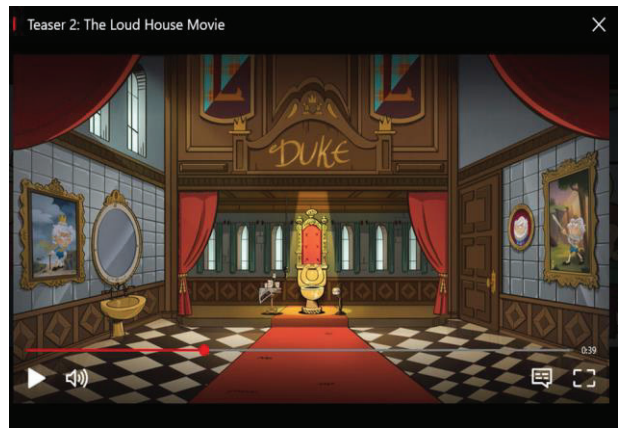
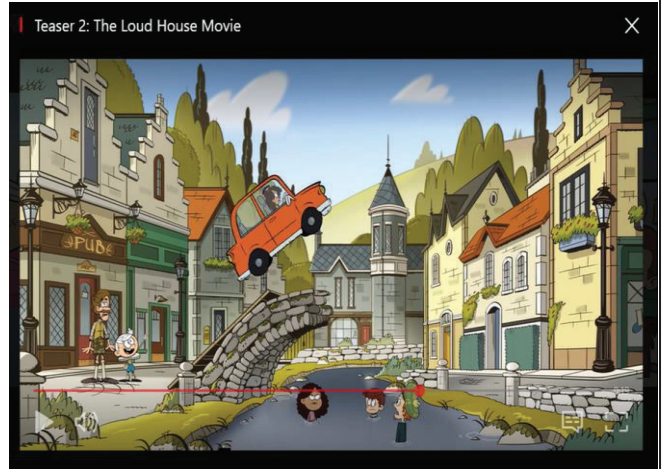
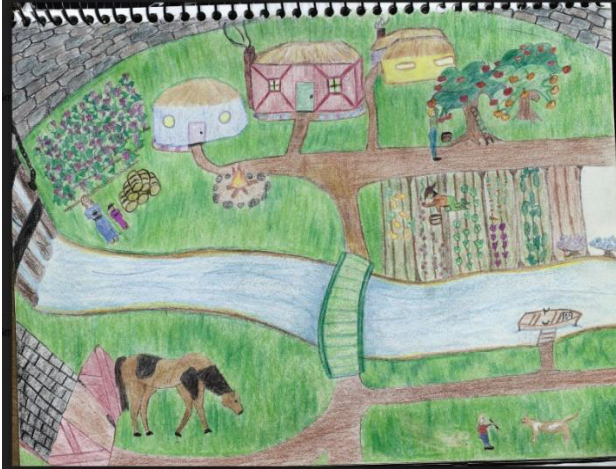
1 160) **Michigan December 2021:** While home doing chores on or around the 20<sup>th</sup> of  
2 December the PLAINTIFF was streaming TV. A panel of movie suggestions  
3 populated on the screen. One of those movies was *The Loud House Movie*. The  
4 PLAINTIFF was intrigued and decided to watch it. While *The Loud House Movie*,  
5 was playing the PLAINTIFF recognized the work as a derivative and direct  
6 copyright infringement of original works she authored. The most glaring  
7 infringements the PLAINTIFF recognized came from three works she had created.  
8 They are titled *Prince of Pizzan*, *The Muffin Muncher: The Musical*, and *Live! With*  
9 *Truly*.

10 161) The PLAINTIFF alleges that the COMPANY, STUDIO, and DEFENDANTS  
11 named herein, not only knowingly and willingly took great care to fashion the film  
12 from the PLAINTIFF'S original work, but also went to great lengths to lull  
13 everyone into believing the infringement never occurred. Part of this lulling  
14 process included the film's omission from the theaters, their decision to offshore  
15 production to the UK, and their decision to distribute the film through broadband  
16 streaming on Netflix rather than their own streaming platform. Below are  
17 comparisons of *The Loud House Movie* to the PLAINTIFF'S *Prince of Pizzan*,  
18 including copyrightable elements of theme, setting, character, time sequence, pace,  
19 and total concept and feel which are protectable elements of copyrighted worked  
20 under the Copyright Act, 17 U.S.C. § 101 et seq.

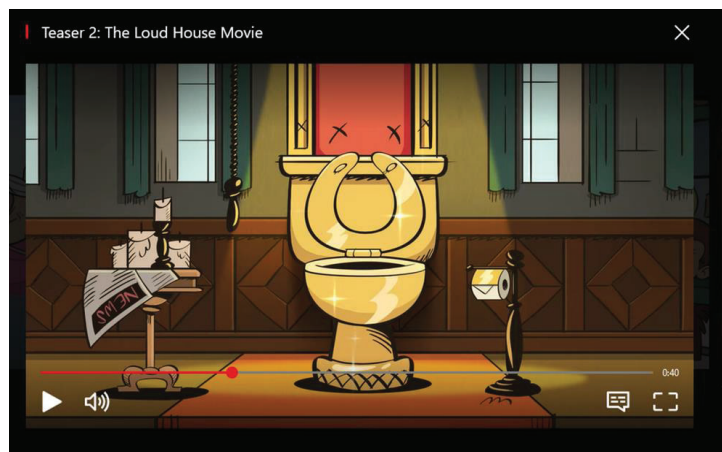
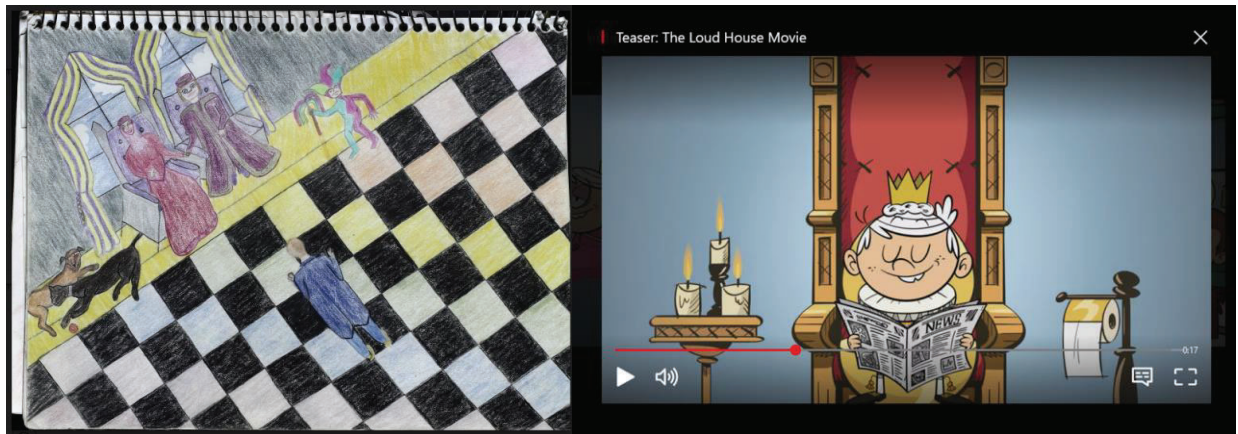


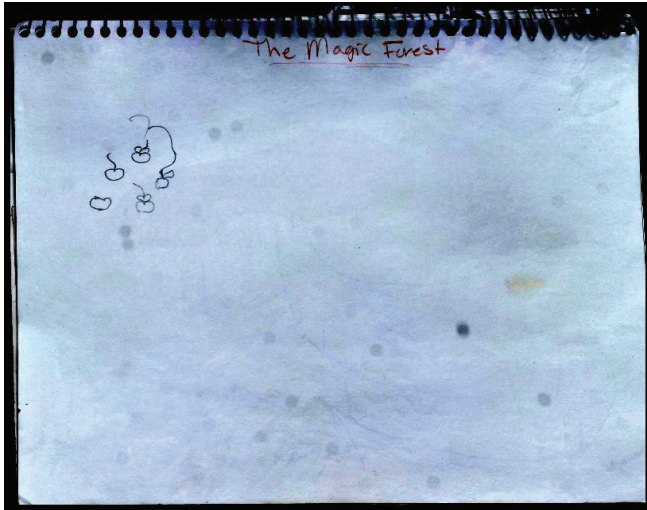












GYPSY CONTINUES

Do you know of the Magic Golden Forest where golden apples hang on silver trees?

PRINCE

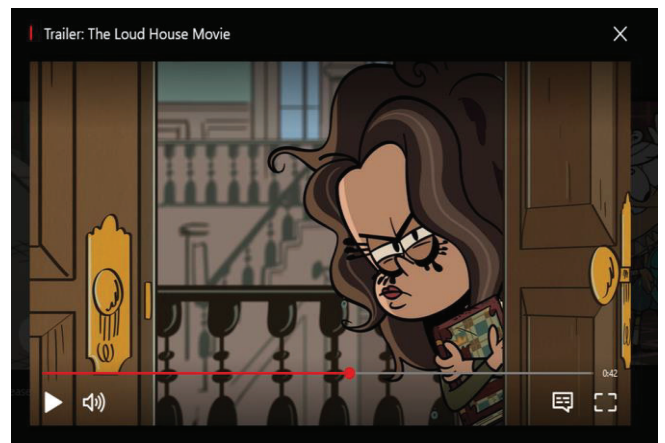
Yes, I have been in search of it. I have come from Pizzan where my father is his Majesty. I have been in search of answers. But for what I am not sure.

GYPSY

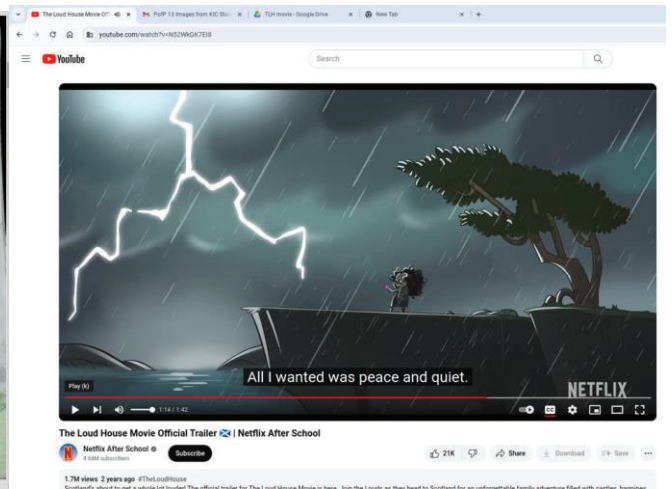
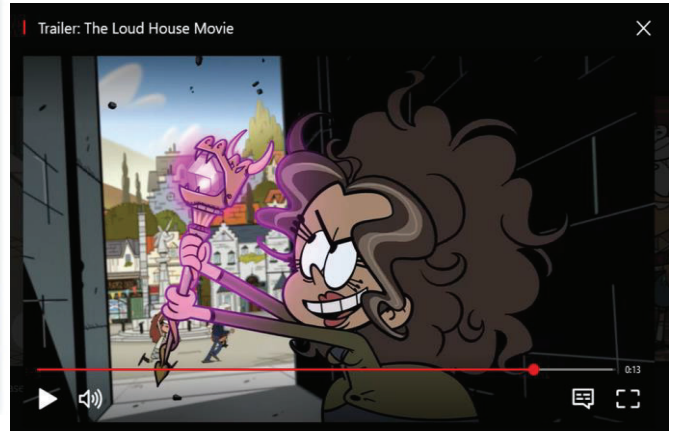
The Golden Forest is a place where time seems to stand still. Where people get lost in the magic of the forest's illusions.

PRINCE

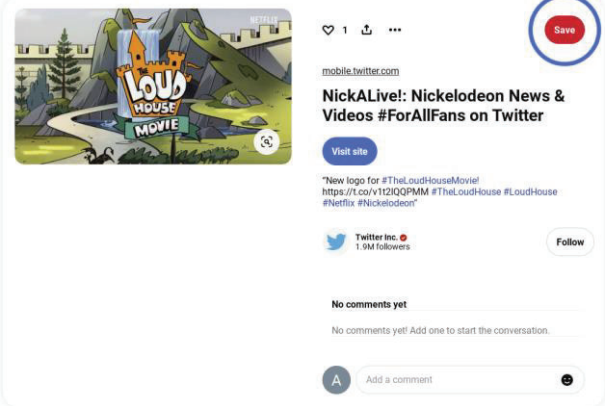
I have heard of some of the tails.











13.

The Giant laughs even harder to the point where the had to steady themselves while the ground shook.

GIANT  
Then you know nothing of the Treasure Chest?

PRINCE  
(looks bewildered) No, I am afraid not.

GIANT  
Although I may later take you on your offer of a chest full of gold, for now you may cross over and join me on the other side for free. This time.

PRINCE  
Thank you kind sir, for your mercy.

The Prince and his companions cross over very carefully.

GIANT  
Come, I have to tend to my flock. Do you mind?

The Giant hands the Prince his staff as he picks up the Treasure Chest with ease and hoists it on his shoulder. The Prince hands him is staff back.

GIANT CONTINUES  
Follow me. I will lead the way.

Not far off they crest a hill. The horizon stretches out before them. They could see for the first time the river winding down to feed the Great Waterfall. And there amongst the green rolling hills were dots of white sheep grazing.

A Montague of the the Prince telling him of the Gypsy and of the great Voice of Wisdom. The Giant shared tales of his ancestors and how he came to be the protector of the egg.

GIANT  
For generations we have been given the task to protect the last know Water Dragon Egg. Only the suitor of noble character and truth in heart can open the chest. The dragon is hibernating in its infancy form until the Dragon's master comes along. Once that happens a great bond will form.

The Prince looks at the Treasure Chest. The Giant saw the look in the Princes eyes.

GIANT CONTINUES  
Perhaps, you would like to try to open the chest.

He leaned back in his seat and lit a smoking pipe watching the Prince.

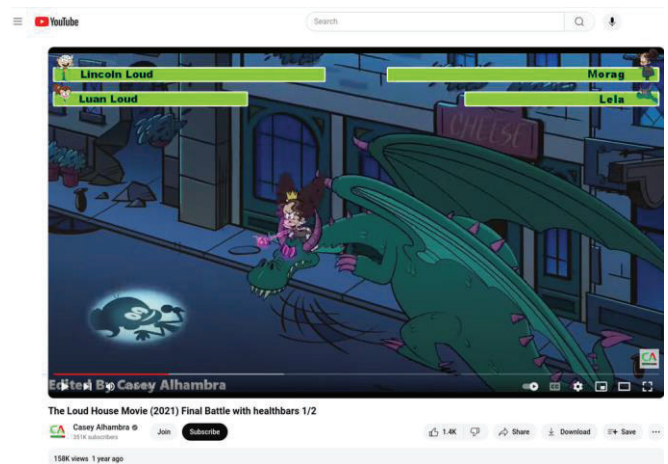
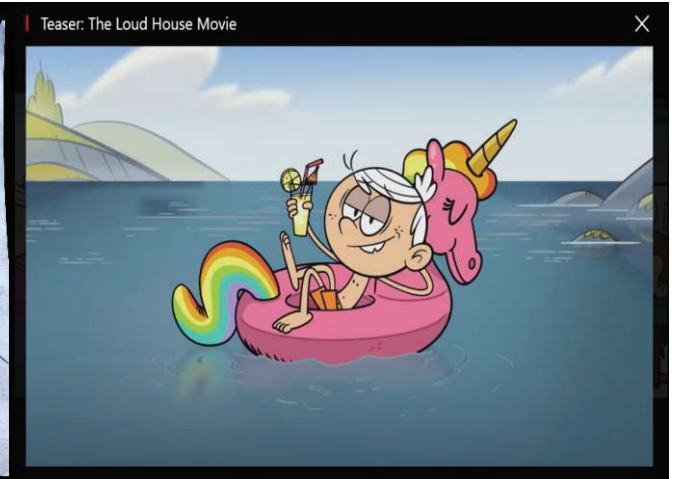
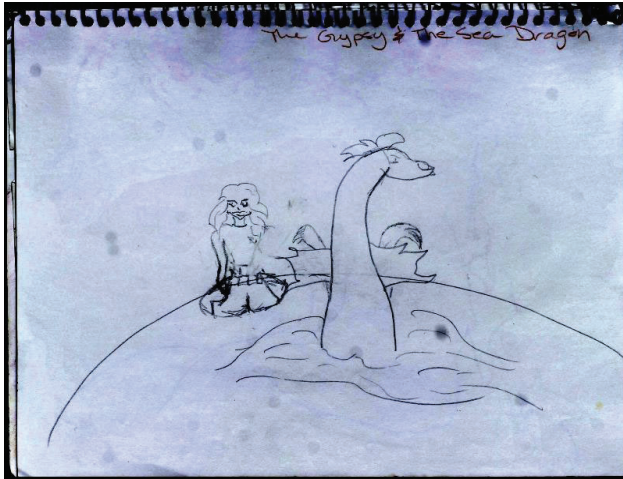
PRINCE  
You mean me?

The Giant shrugged and tilted his head studying the Prince.

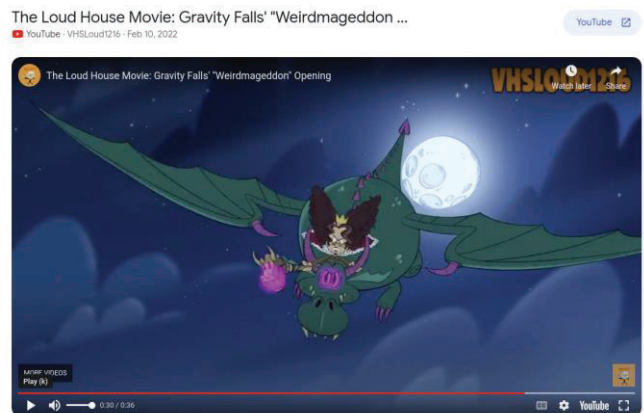
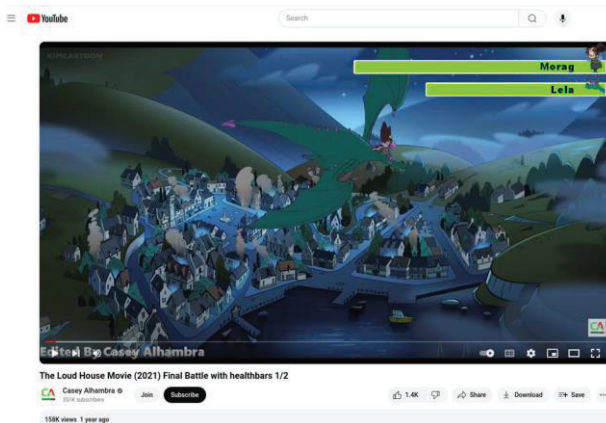
GIANT  
Why not? Do you have a heart of gold? You seem to be of noble character and have a heart of truth. Your quest is one of answers not one of turmoil, and you are here. Yes, you.

The Prince gazes at the Treasure Chest again. The Giant takes on his pipe continuing to watch the Prince. He leans down and pats the dog.











132) **Events Leading up to December 2021:** From a young age the PLAINTIFF Ms. Alethea O'Toole wanted to be in the entertainment industry. Her first love was dance and theatrical performances. As the PLAINTIFF approached her teen years, she found herself leaving home and dropped out of high school; however, this did not stop the PLAINTIFF, from pursuing her dreams.

133) On September 15<sup>th</sup>, 1998 her son Hunter Jordan O'Toole was born. But the baby was two months premature and spent several weeks in the neonatal intensive care unit of the hospital. The PLAINTIFF spent every waking visitor hour that she could at her son's side; however, she went through postpartum depression caused by not being able to bring her baby home. To relieve herself of poor spirits while she spent time at the hospital, she decided to start illustrating and writing a story for her son. She named that story *Prince of Pizzan*.

134) After the birth of her son, PLAINTIFF Hunter Jordan O'Toole, Mrs. O'Toole continued to pursue her dreams and submitted an application to the University of Hawaii, where she was accepted. She moved with her son (then 2 years old) and former husband to Hawaii where she began attending courses.

135) From 2003-2007 the PLAINTIFF worked diligently to earn a double degree in Business Administration and Theatre Arts. In 2004 as part of a school project the PLAINTIFF was given permission from Penguin Random House Books to turn one of their published works into a scripted musical.

1 136) In 2006 the PLAINTIFF worked with Hawaii's local National Public Radio  
2 station to direct and produce a live performance for later radio play. That same  
3 year she was accepted into New York University where she attended a summer  
4 program focused on film and commercials. Prior to graduation she took children's  
5 linguistics, drawing, painting, music, theatre, directing, set design, dance and a full  
6 load of business courses.  
7

9 137) During this time, she also told her son bedtime stories. After encouragement  
10 from her ex-husband to start writing them down, the PLAINTIFF began writing a  
11 series of stories she called *Max and Puppy*. These were the main characters of  
12 PLAINTIFF Hunter O'Toole's bedtime stories.  
13  
14

15 138) In 2009 the PLAINTIFFS moved to Los Angeles where Ms. O'Toole planned  
16 to pursue a career in writing, producing and directing theater, film, and/or  
17 television.  
18

19 139) After advice from her professors they settled in Pasadena, California. The  
20 PLAINTIFF started applying to studios and companies in the entertainment  
21 industry and became a member of the Women in Film Organization (WIF) – Los  
22 Angeles chapter.  
23

24 140) In the summer of 2010, she interviewed for a position with Corovan. The  
25 interview took place on The Walt Disney Studio Lot in DEFENDANT D. Scott  
26 Haynes office. It was the PLAINTIFF'S first time being in a studio lot and she was  
27  
28

1 so excited and nervous she locked her keys in the car. But she landed the job.

2 Present at the time of the interview were Carlos Velasco, Guillermo Argueta, and  
3  
4 D. Scott Haynes.

5 141) Shortly after the PLAINTIFF began working for Corovan Mr. Haynes began  
6  
7 pursuing a personal relationship with the PLAINTIFF. Around the same time  
8  
9 DEFENDANT Lucy Magaña was hired onto the same contract with the same  
10  
11 duties as the PLAINTIFF.

12 142) Between 2010-2011 Ms. Magaña started having personal relations with  
13  
14 Guillermo Argueta, and there were implications that she had also started seeing  
15  
16 Mr. Haynes. By the end of 2011 the PLAINTIFF had been pushed out of Corovan,  
17  
18 took a severance, and began working in the mail room at the Disney Channel  
19  
20 Building.

21 143) It was the holiday season and Ms. O'Toole had been offered this opportunity  
22  
23 from Sean Devlin who had originally been part of Mr. Haynes's hiring process.  
24  
25 Mr. Devlin had also worked closely with the PLAINTIFF while she was at  
26  
27 Corovan. She had been assigned to preparing and presenting all billable charges  
28  
that were incurred under Sean's division as Senior Manager of Facilities at the  
Disney Channel Building.

144) The Disney Channel Building is home to ABC Family, Disney Radio, Disney  
Channel, Disney Jr., Disney XD and more. During her time in the mailroom, she

1 began “elevator pitching” people she met at the channels. In 2012 she made  
2 acquaintances with staff at Disney XD including Chris Savino who was working as  
3 Director of Kick Buttowski.  
4

5 145) The PLAINTIFF pitched her *Max and Puppy* story to one of the executives as a  
6 potential script to develop at Disney. The executive said they would be willing to  
7 accept a copy of the story and would pass it on to the Director at Disney XD who  
8 had the correct decision-making power.  
9

10 146) Shortly after the PLAINTIFF was brought aboard to ABC Family as a Second  
11 Assistant to the President of ABC Family. She worked alongside his Executive  
12 Assistant, whom had been with the company for over 20 years. Formally her and  
13 the President of the channel had worked at Disney Radio under Jill Casagrande.  
14

15 147) ABC Family was a new channel to the Disney lineup and had been receiving  
16 tremendous success under the guidance of Michael Riley the President. It was also  
17 unique in the sense that nearly all of the SVP C+ level staff members were women.  
18 The channel brought on Lynn Stepanian as head of Acquisitions and Scheduling.  
19 The PLAINTIFF assisted both Ms. Stepanian and Mr. Riley till her move to  
20 Corporate FP&A.  
21

22 148) At the Corporate division the PLAINTIFF was hired on to directly under the VP  
23 of Corporate Controllershship who went on to become head of Auditing for  
24 Worldwide corporate affairs. The PLAINTIFF’S duties included supporting  
25  
26  
27  
28

1 executives all the way up to the CFO. The PLAINTIFF carried the responsibility of  
2 being the head assistant within her division supporting a dozen Directors,  
3 Managers, and the VP. She was often on the Lot but was working within  
4 accounting and finance rather than the creative side of the studio.  
5

6  
7 149) In 2012 DEFENDANT Mr. Haynes left the studio, and unbeknownst to the  
8 DEFENDANT Chris Savino was in a bit of hot water and was leaving the studio  
9 for hopes of getting his own show with his former employer and Disney XD's  
10 direct competitor Nickelodeon.  
11

12 150) In 2013 Savino worked with Jenna Boyd SVP of Development to create a 2.5  
13 minute short. The short was a story about rabbits. A boy rabbit and his 25 sisters.  
14 But Jenna felt that storyline would not sell well to Nickelodeon and she worked  
15 with Mr. Savino over the next year to recreate the storyline into a 2.5-minute story  
16 about a boy who lives at home with his sister(s), parents and pets. At the time the  
17 short was released the storyline only had 11 characters total minus the pets.  
18  
19

20 151) In the Spring of 2014 the PLAINTIFF worked on a number of projects in  
21 efforts to build her skills in the industry. While at the WIF she became acquainted  
22 with Kate Reese-Davies while they worked on a PSA together. Reese-Davies was  
23 about to direct her first PSA and a short film. She brought on the PLAINTIFF to  
24 help with production design. The PLAINTIFF also offered her home as a location  
25  
26  
27  
28



1 to shoot the short film. PLAINTIFF Hunter O'Toole also participated in the film as  
2 a bit part actor and helped his mom throughout the filming.

3  
4 152) The lead actress on the film was Jennifer Blanc-Biehn. Mrs. Blanc-Biehn is  
5 married to Michael Biehn who starred in *Aliens* and *Terminator* with James  
6 Cameron and Ridley Scott. Mr. and Mrs. Biehn had started their own production  
7 company in the genre of horror and suspense films. She had hired Reese-Davies as  
8 Producer for a new film they had slated to start filming a few days later. The film  
9 was titled *Fetish Factory*. Reese-Davies brought the PLAINTIFF on to work on set  
10 design and props. The PLAINTIFF brought her son in toe on several occasions.  
11 One of the props the PLAINTIFF was in charge of, was to create a box for a  
12 ventriloquist dummy that was being used in one of the scenes. The dummy told  
13 bad jokes and was meant to be a comedy relief in the middle of a zombie cult  
14 classic.

15  
16  
17  
18  
19 153) The PLAINTIFF worked on a second film for Blanc-Biehn Productions titled  
20 *Mindless*. It wrapped in May/June 2014 just weeks before she was approached by  
21 TajMania Entertainment and Nickelodeon announced the success of Chris Savino's  
22 2.5-minute short.

23  
24  
25 154) In 2014, Ms. O'Toole was approached quite randomly by Howard Gimple from  
26 TajMania Entertainment. He explained he was a published murder novelist from  
27 New York, that he was part of a children's animation company, and was looking  
28

1 for a new way to pitch Disney their work, or interested in any personal projects the  
2 PLAINTIFF may have. The PLAINTIFF believed them to be genuine and accepted  
3 an offer to work with TajMania Entertainment. She created original works that she  
4 shared with TajMania Entertainment and her ex-boyfriend D. Scott Hayens.  
5

6 155) In November of 2014 Mr. Haynes married his longtime girlfriend  
7  
8 DEFENDANT Tureka Tara Turk in a secret wedding in Paris, France. They then  
9 had a second surprise pop up wedding in Los Angeles following their Honeymoon  
10 in Paris. Despite their marriage Mr. Haynes had expectations that he and the  
11 PLAINTIFF would continue having an intimate relationship, stating, “that doesn’t  
12 change ‘US.’”  
13  
14

15 156) In 2015 Nickelodeon, with the help of Jenna Boyd, bought Chris Savino’s short  
16 and wrote a contract for him to develop his first “original” animated show. The  
17 STUDIO and COMPANY gave him a budget to bring on staff and develop the  
18 show further. Savino, DEFENDANTS, and Does worked diligently to develop a  
19 show over the course of the next years’ time.  
20  
21

22 157) In 2015 Nickelodeon announced that it was premiering Chris Savino’s 2.5-  
23 minute short of *The Loud House* at Comic-Con in San Diego. To the best of her  
24 knowledge, the 2015 showing of the short at the 2015 Comic-Con was the first  
25 time the short had been played in public.  
26  
27  
28

1 158) It was shortly after this in 2015, that DEFENDANT Jenna Boyd left  
2 Nickelodeon after her 18-year veteran status.

3  
4 159) DEFENDANT Mr. Haynes is also an avid comic book collector. He and  
5 DEFENDANT Mr. Savino both share a love for comics and the comic strips. As  
6 well as being a lover of comics, the DEFENDANTS have regularly attended  
7 Comic-Con events. Mr. Haynes has regularly attended Comic-Con events for many  
8 years. DEFENDANT T. Tara Turk-Haynes attended Comic-Cons in California  
9 prior to 2015 to promote work she collaborated on. Jennifer Blanc-Biehn and her  
10 husband also attended Comic-Con in 2016 to promote the anniversary of *Aliens*. In  
11 later emails DEFENDANT D. Scott Haynes mentions “talked to the Director” of  
12 the films the PLAINTIFF had worked on. This is one way they could have met.  
13  
14  
15

16 160) *The Loud House* premiered on May 2<sup>nd</sup>, 2016.

17  
18 161) By the end of 2016 the STUDIO under the guidance of, and with permission  
19 from the COMPANY, had greenlit two additional seasons and doubled the shows  
20 episodes to 26.  
21

22 162) By this time Hunter had been greatly affected by the relationship between the  
23 PLAINTIFF and DEFENDANT. Mr. Haynes who the PLAINTIFF finds to be an  
24 extremely aggressive person, has caused turmoil in their lives, with broken  
25 promises, pretense, lack of fatherly kindness and attention, abusive language,  
26  
27  
28

1 mental manipulation, and harassing behavior. Both PLAINTIFFS had battled  
2 depression and depressive thoughts.

3  
4 163) The PLAINTIFF was also concerned that the DEFENDANT was interfering  
5 with her employment and possibly blackballing her in the industry.

6  
7 164) After finding *The Loud House* the PLAINTIFF Ms. O'Toole began identifying  
8 characters drawn into *The Loud House* in the "likeness" of, or using the  
9 "namesake" of herself, PLAINTIFF Hunter O'Toole, as well as DEFENDANTS  
10 listed in this claim. She recognized: D. Scott Haynes as "Clyde McBride", T. Tara  
11 Turk-Haynes as "Tara", Howard Gimple as "Howard McBride", Larry Juris as  
12 "Lynn Loud Sr.", Becky Gimple as "Becky", and Sam Laskey in several characters  
13 including "Sam", "Sameer", and "Benny". She also recognized Bethany Savino  
14 (Chris Savino's ex-wife), (See EXHIBITS)

15  
16  
17 165) Ms. O'Toole identified the use of PLAINTIFF Hunter Jordan O'Toole's first  
18 name, middle name, and "likeness" as: "Boy Jordan", "Flat Tire", "Hunter  
19 Spectrum", and other unnamed characters. Nickelodeon also used images of the  
20 PLAINTIFF to build situations, settings and storylines from his "likeness". The  
21 PLAINTIFF finds the depictions defamatory and offensive.

22  
23  
24 166) The PLAINTIFF Alethea O'Toole identified herself as "Girl Jordan", "Lana  
25 Loud" and "Luan Loud" in defamatory situations and depicted in an offensive and  
26 defamatory way.  
27  
28

## Copyright Infringement #2

### 162) November 26th, 2021 - Paramount+ Releases, *A Loud House Christmas*:

The PLAINTIFF asserts that the DEFENDANTS further infringed with lulling intentions when they released *A Loud House Christmas*, which, “is a 2021 American live-action Christmas comedy adventure family television film based on the Nickelodeon animated series, *The Loud House*. The film is directed by Jonathan Judge, written by Liz Maccie. “This is the first live-action work and second film in the overall franchise after *The Loud House Movie*, it aired on Nickelodeon on November 26, 2021, and started streaming on Paramount+ the same day.[1][2] The film also serves as the backdoor pilot of the sequel series, *The Really Loud House*.” (Wikipedia)



([https://en.wikipedia.org/wiki/A\\_Loud\\_House\\_Christmas](https://en.wikipedia.org/wiki/A_Loud_House_Christmas))



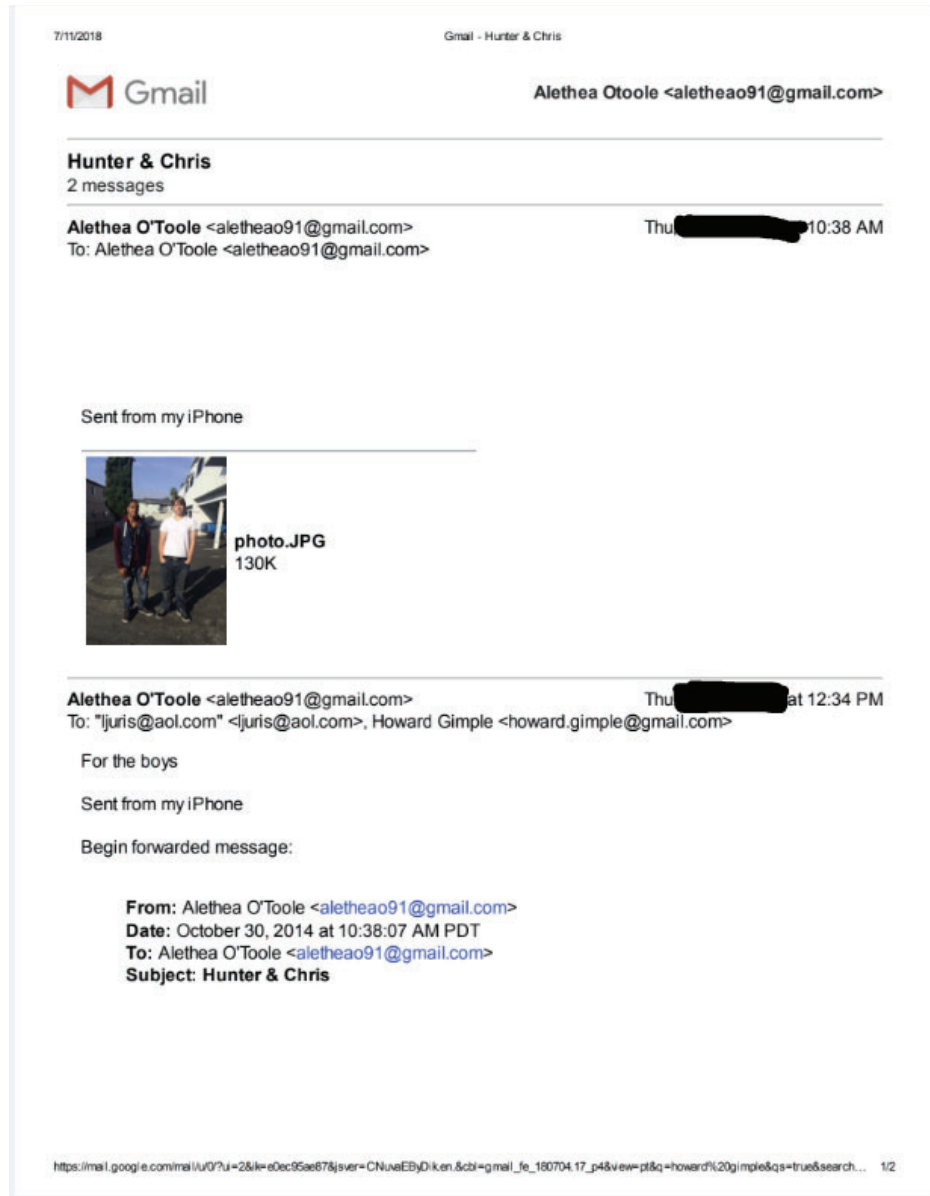
163) **2014 PLAINTIFFS' Photo, TajMania Entertainment, and The Loud**

**House:** In 2014 the PLAINTIFF Alethea O'Toole, sends this photo of her son, PLAINTIFF Hunter O'Toole, and one of his best friends (Chris), to TajMania Entertainment as part a of package she was developing for a new script and pitch package, which the THIRD PARTY TajMania Entertainment agreed to send out to the studios for compensation. The PLAINTIFF alleges that TajMania had access to said script titled *Live! With Truly*, and this photo. The PLAINTIFF further alleges that DEFENDANT Darryl Scott Haynes had access to and knowledge of the script, Hunter and Chris's role in it, and Hunter in general. And that Mr. Haynes often interacted with Hunter in the capacity of a step-father figure.



Sent from my iPhone

a)



b)

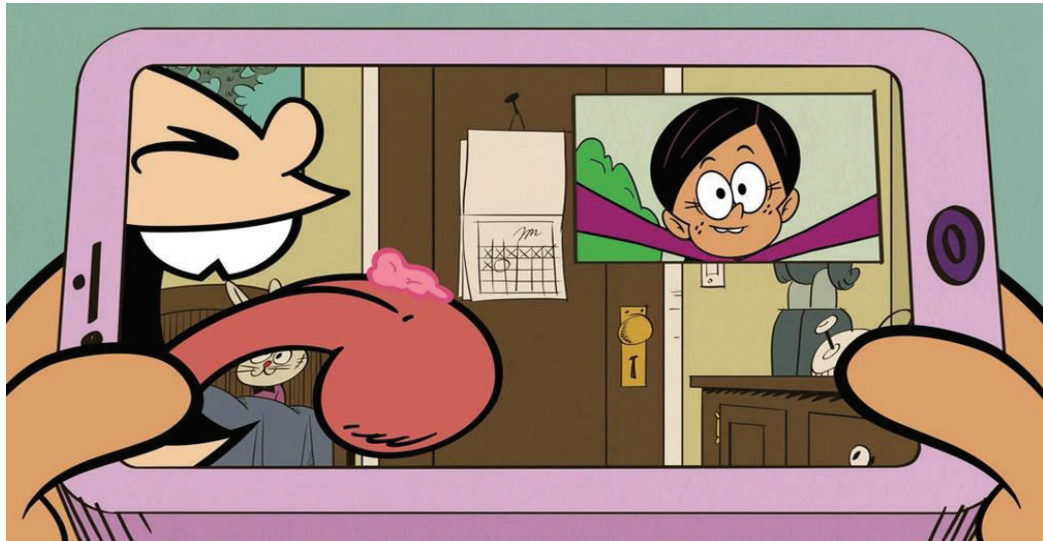


c)

d)



e)



166) PLAINTIFF Hunter O'Toole (on the right in photo a.) was meant to be the main protagonist of the new original scripted cartoon that his mother was working on. The image was taken during the development process and sent to DEFENDANTS Howard Gimple and Larry Juris, who had never met either of the PLAINTIFFS in person; and was meant to provide DEFENDANT Tom Caggiano and the THIRD PARTY TajMania Entertainment, with the images Ms. O'Toole wanted to feature

1 in the animated version of the work as elements for the characters Ryder (Hunter)  
2 and PB&J (Chris). These two characters Ryder and PB&J are the two main male  
3 characters in the work *Live! w/ Truly* authored by the PLAINTIFF Alethea  
4 O'Toole. The PLAINTIFF was told that DEFENDANT Tom Cagliano would be  
5 working on storyboard images that could accompany the script, which would be  
6 packaged and distributed as pitch material to studios in Hollywood and New York,  
7 with intention to sell it for profit.  
8  
9

10  
11 Our next step on the creative side should be to get the bible for Truly in the works. Most of the concepts should go  
12 through me (Howard). Tom doesn't like to start on the illustrations until the stories and characters are totally ironed  
13 out. I am attaching the other bibles and pilots.

14 167) The character Ryder was given traits that are character traits of the writer's son,  
15 PLAINTIFF, Hunter O'Toole. For instance, Hunter was on the swim team and  
16 football team at his high school. He focused his high school studies in the medical  
17 field and competed in the state championships on his school's HOSA (Health  
18 Occupations Students of America) team (<https://hosa.org>). He loves gaming and has  
19 studied computer science. He also worked on films with his mother and is good with  
20 a camera. He chose friends of all nationalities. Hunter was a born leader; as a Virgo  
21 he likes reason, can be analytical, independent, kind, easily bored, and does not like  
22 when things don't go right. Other attributes of his were introduced into the *Live!*  
23 *with Truly* universe to develop other main characters therein, such as his best friend  
24 PB&J, who loves computers and is high school football star.  
25  
26  
27  
28



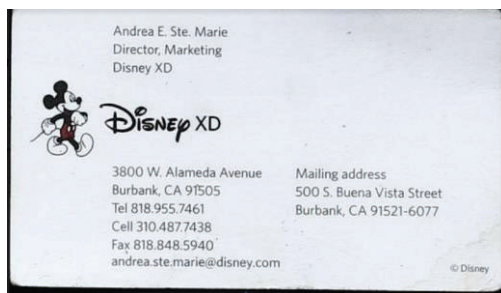
### Copyright Infringement #3

#### *The Loud House, the Series; and Nickelodeon Short's Program*

#### 164) 2011-2012 PLAINTIFF Alethea O'Toole submits short script to DisneyXD:

The end of 2011 to early 2012 the PLAINTIFF Alethea O'Toole, and DEFENDANTS Chris Savino, Darryl Scott Haynes, and Lucy Magaña, Guillermo Argueta and Carlos Velasco were all working at The Walt Disney Company. The PLAINTIFF had just left a position with Corovan to work within the facilities department at TWDC, in the Mailroom as a Clerk at the Disney Channel Building for holiday help. During the course of her duties, she met Chris Savino as well as other C+ executives at Disney XD, Disney Junior, ABC Family, Disney Radio and other cable channel divisions. The PLAINTIFF pitched and submitted a short script titled *Max & Puppy* to employees at Disney XD for consideration as a new cartoon. They “passed it along” to the Director who had the decision-making power over creative decisions.

a)





165) **2013 Chris Savino submits to Nickelodeon Shorts Program:** In 2013

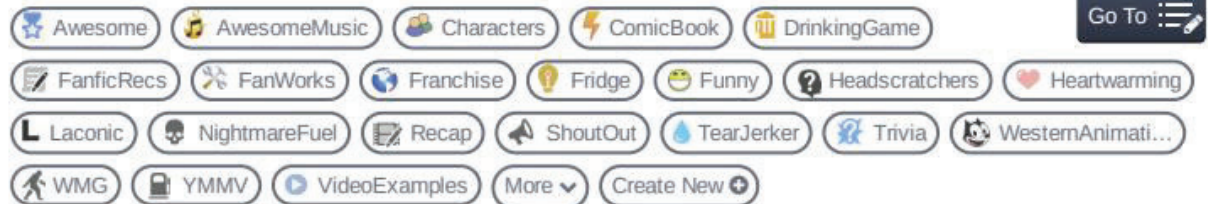
DEFENDANT Chris Savino makes initial submission to the STUDIO'S

Nickelodeon Shorts Program. Below is the earliest known rendering of the

submission. Next to it is an excerpt from the PLAINTIFF'S *Max and Puppy*.

## What Could Have Been / The Loud House

Follow



### Max and Puppy

DAD CONTINUES

Ladies and gentleman you should never  
juggle puppies but you can juggle  
rrrrrrabbits! Now let's see where I  
put that.

He went to a trunk and began taking things out one by one  
raising it high in the air for everyone to see while his nose  
was deep in search.

DAD CONTINUES

A book... no... a sock... no... Aha! A  
rubber chicken!...No...here it is a  
rrrrrrabbit!

Out emerged a very cute stuffed white rabbit.

DAD CONTINUES

Before I begin I will need two more  
items from the audience.

MAX

Juggle my soccer ball!

MOM

How about puppy's tennis ball?

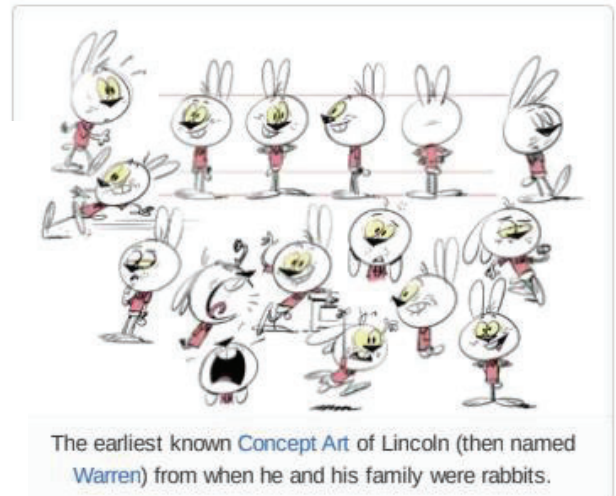
DAD

Very well, the Amazing Fredro will  
juggle this rrrrrrrabbit, this soccer  
ball and this tennis ball.

The audience laughed and cheered for the Amazing Fredro as he  
continued to entertain them with his juggling act and jokes.

DAD CONTINUES

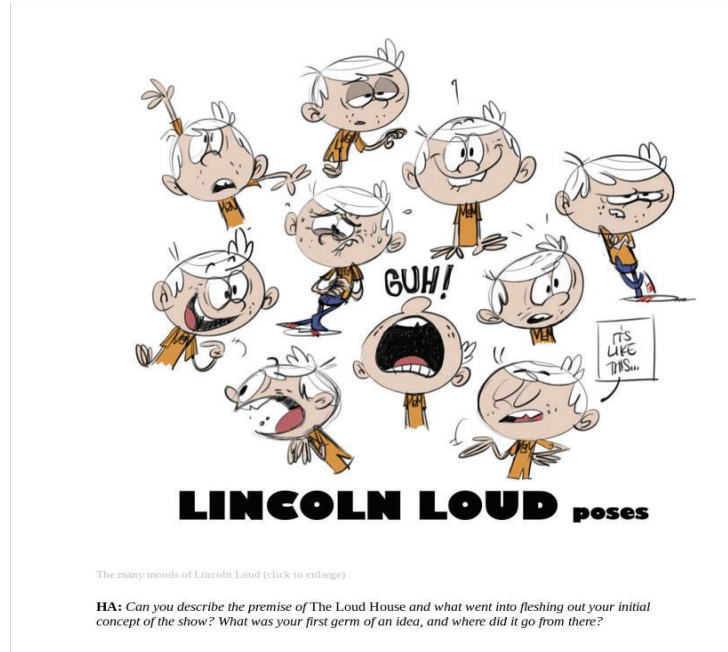
And for the grand finale...



The earliest known Concept Art of Lincoln (then named Warren) from when he and his family were rabbits.

166) **May 2, 2016 Hogan's Alley:** Publishes developed drawings of Lincoln Loud

submitted by Chris Savino, released on the show's Premiere date.



a)

<https://www.hoganmag.com/blog/loud-out-loud-an-interview-with-animator-chris-savino>

167) **Variety Magazine, 2014:** A 2014 announcement published by Variety Magazine displays the first published rendering by Savino resembling the current state of *The Loud House*, that which is the basis and foundation for *The Loud House Movie*. The STUDIO, claimed it was original work by Savino. They announced plans to move forward with the COMPANY'S newly reworked short titled "Bathroom Break" overseen by Nickelodeon vet DEFENDANT Jenna Boyd and directed by DEFENDANT Chris Savino, Kevin Marshal and Does.

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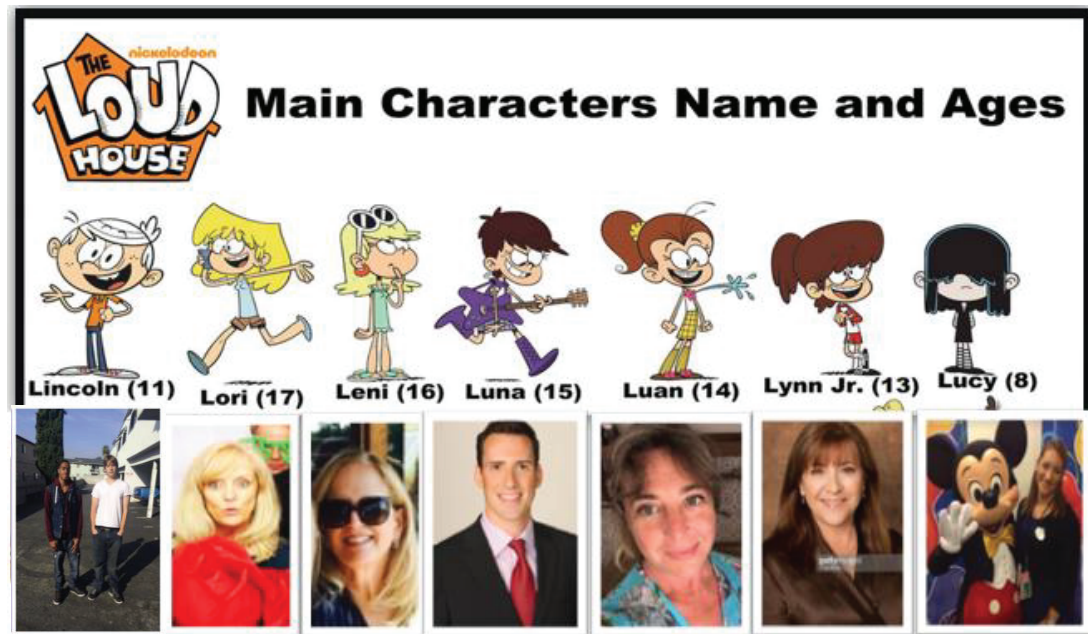
a) 1 of 16

Page 1 / 5

4/26/2024, 9:11 AM

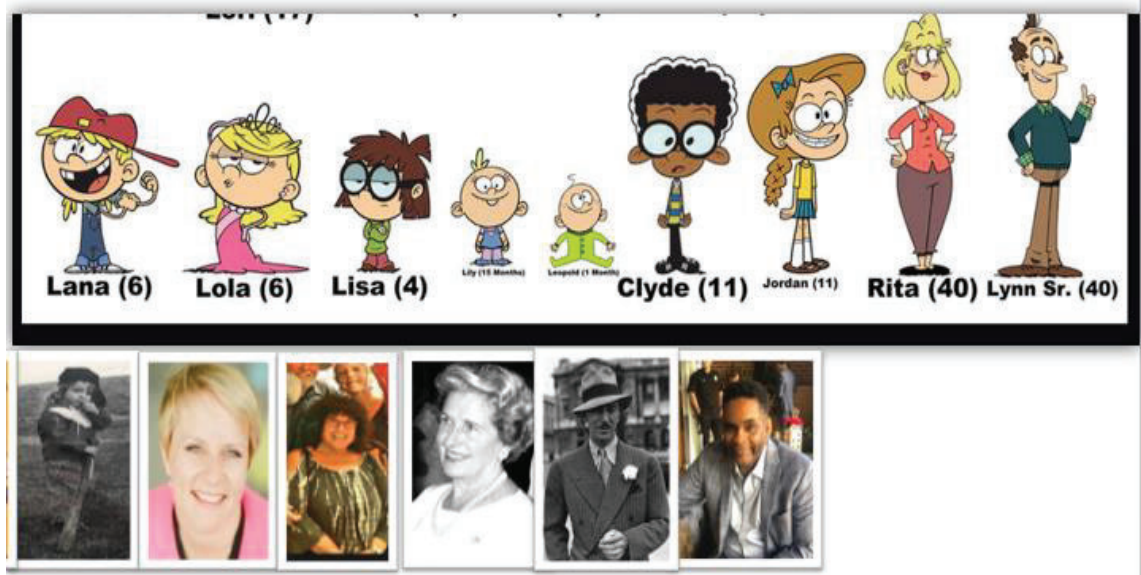
168) After discovering the *Loud House* series, the PLAINTIFF, Ms. O’Toole, immediately recognized the 11 main characters released in the *Loud House* as herself, PLAINTIFF Hunter O’Toole, DEFENDANTS Lucy M. Magaña, and D. Scott Haynes, and 7 of her supervisors at The Walt Disney Co. It was then that the PLAINTIFF realized that the DEFENDANTS embodied in the controversy, wrongful acts and violations of privacy rights. Below are images of the main characters side-by-side with the individuals mentioned above. See EXHIBIT (“Plaintiff’s Supervisors”) for further details.

169) During the PLAINTIFF'S discovery of the substantial similarities between her personal life and the likeness of the *Loud House* characters, the PLAINTIFF found further discoveries that *Variety Magazine* was following the career of Michael Riley the former President of ABC Family. Previous to the PLAINTIFF working for him at ABC Family, as his Second EA, Mr. Riley worked under Jill Casagrande who headed Disney Radio. See EXHIBITS for *Variety Magazine* articles on Ms. Casagrande at Disney Radio and Mr. Riley exiting Disney Radio to head ABC Family.



- a) They are listed above by title from left to right: PLAINTIFF Hunter O'Toole, Disney Worldwide Corporate Head of Auditing, Director of Finance, President of ABC Family, PLAINTIFF Alethea O'Toole, SVP of Acquisitions for ABC Family, and DEFENDANT Lucy Magaña.





b) They are listed above by title from left to right: PLAINTIFF Alethea O'Toole at the age of 2, VP Disney Corporate Digital Marketing, Executive Assistant to President of ABC Family, Lily Disney, Walt Disney, DEFENDANT Darryl Scott Haynes,

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## Copyright Infringement #4

### *The Loud House*, short “Slice of Life”

170) Other Nickelodeon short submissions listed within the Variety article mentioned herein the claim, included a submission titled: “Bad News Bunny” and “Francine” about a girl robot who battles over a slice of Pizza.

Nickelodeon announced its 11 finalists from its 2014 Animated Shorts Program. The shorts will be produced by the end of the year. They are:

- a) •“Francine” by writer/comedian Katie Crown – The story of a strangely brilliant girl who battles a robot version of herself for her life and a slice of pizza.
- b) •“Bad News Bunny” by California State University, Fullerton, graduate Tarryn Henderson – A stuffed toy bunny stuck babysitting two bored kids will stop at nothing to entertain them.
- c)

171) [https://theloudhouse.fandom.com/wiki/Slice\\_of\\_Life](https://theloudhouse.fandom.com/wiki/Slice_of_Life)

172) **“Slice of Life”**: According to Nickelodeon, “Slice of Life” is an Internet-exclusive short, based on *The Loud House*. It is an adaptation of the 2015 mini-comic Lincoln Loud's ABCs of Getting the Last Slice. Plot: Lincoln and his sisters fight over the last slice of pizza.” However, the PLAINTIFF finds the story to be nearly identical to the 2013 short submission “Francine” and is redolent and indicative of conversations she had with the THRID PARTY TajMania Entertainment and DEFENDANT Howard Gimple in regard to *Prince of Pizzan*.



Alethea Otoole <aletheo91@gmail.com>

## Following Up

13 messages

**Howard Gimple** <howard.gimple@gmail.com>  
To: aletheo91@gmail.com

Thu, Aug 1, 2024, 3 PM

Hi Alethea,  
Thanks for taking the time to meet with Sam. He asked me to remind you to email the Muffin Muncher script. He said he thought it had good possibilities. Once we have a look at it, we'll talk about how we move forward.

Have a great weekend!  
Howard

**Alethea Otoole** <aletheo91@gmail.com>  
To: Howard Gimple <howard.gimple@gmail.com>

Tue, Sep 3, 2024, 1 PM

Hi Howard,

Hope your Labor Day weekend has been well. It was great meeting with Sam.

I attached the three concepts that Sam and I talked about. The first is Muffin Muncher, as well as Max and Puppy and The Prince of Pizzan

a)

### 5 attachments

**The\_Muffin\_Muncher[1].pdf**  
4153K

**Max and Puppy.doc**  
43K

**Max and Puppy - puppies first snow.doc**  
25K

**the Prince 1 of 2.pdf**  
4028K

**the Prince 2 of 2.pdf**  
275K

**Alethea Otoole** <aletheo91@gmail.com>

Tue, Sep 3, 2024, 5 PM

To: Howard Gimple <howard.gimple@gmail.com>, Samuel Laskey <samuel.laskey@gmail.com>

Adding Sam.  
[Quoted text hidden]

**Howard Gimple** <howard.gimple@gmail.com>  
To: Alethea Otoole <aletheo91@gmail.com>

Mon, Sep 9, 2024, 1 PM

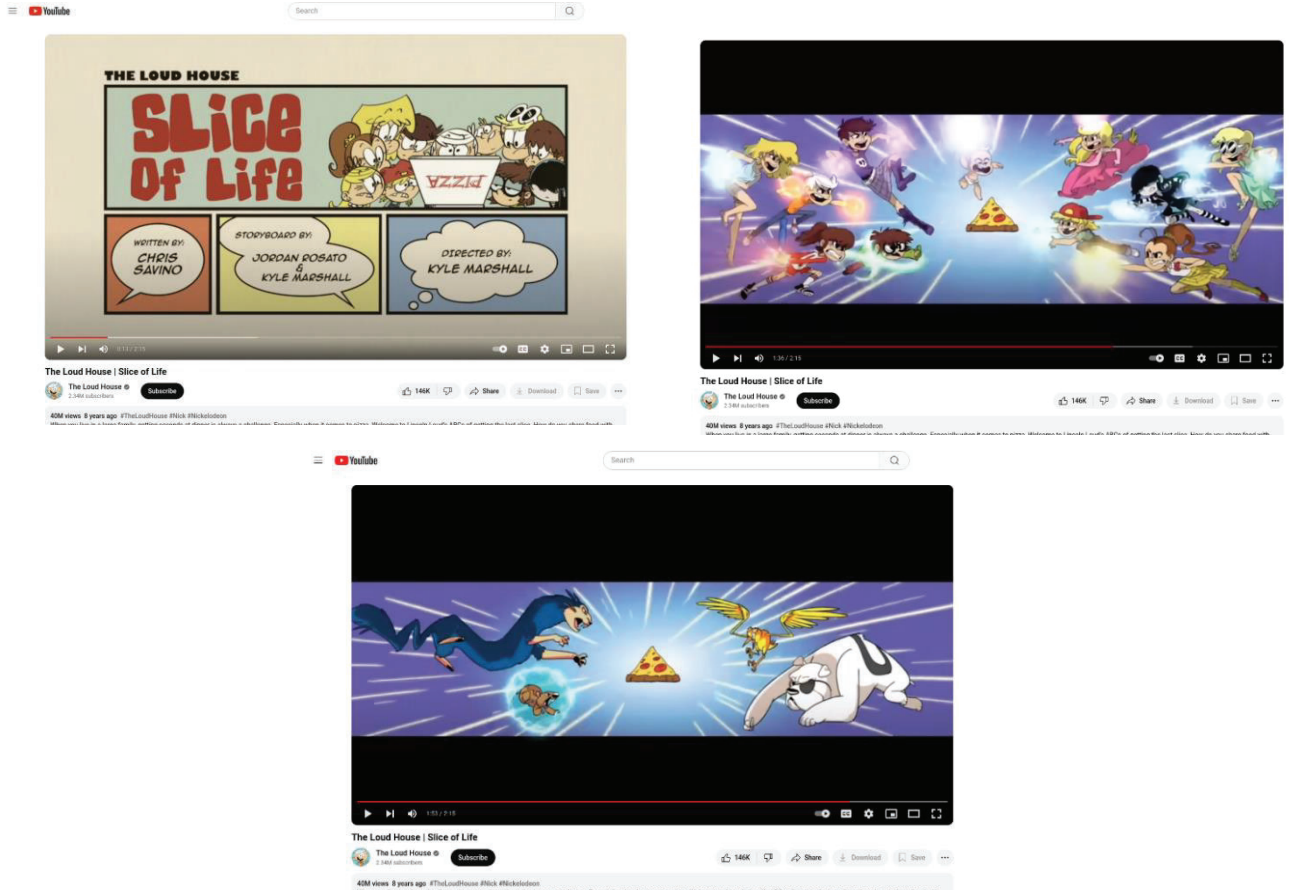
Hi Alethea,  
Thanks for sending me your concepts! I read *Muffin* and *Max* and liked them both. *Pizza* didn't come through for some reason.

b)

///

///

///



[https://theloudhouse.fandom.com/wiki/Slice\\_of\\_Life](https://theloudhouse.fandom.com/wiki/Slice_of_Life)

## Copyright Infringement #5

### *The Loud House*, “Left in the Dark” Season 1:Episode 1A

173) **2015, San Diego Comic-Con:** Comic-Con 2105 is the first public release of *The Loud House* as the STUDIO’S “successful new animated original” series “created” by Chris Savino. On July 13th, 2015 NickAlive! states, “Nickelodeon will held the world premieres of ‘The Loud House’ and ‘Pig Goat Banana Cricket’ at Comic-Con International: San Diego 2015 on Saturday 11th July 2015!” <https://www.nickalive.net/2015/07/first-look-at-nickelodeons-loud-house.html>

1 174) *Animation Magazine* release this statement, “Nickelodeon gave fans at its  
2 Comic-Con 2015 panels a first-look at upcoming episodes of...The presentation  
3 also included additional sneak peeks from *Harvey Beaks* and the upcoming  
4 series *Pig Goat Banana Cricket* and *The Loud House*.”

5  
6 [https://www.animationmagazine.net/2015/07/comic-con-nick-previews-new-](https://www.animationmagazine.net/2015/07/comic-con-nick-previews-new-sanjay-loud-house-renews-tmnt/)  
7 [sanjay-loud-house-renews-tmnt/](https://www.animationmagazine.net/2015/07/comic-con-nick-previews-new-sanjay-loud-house-renews-tmnt/)  
8

9 175) **2015 Infringements of *Live! With Truly* and *Max and Puppy*:** The  
10 PLAINTIFF asserts that Chris Savino used both *Live! With Truly* and *Max and*  
11 *Puppy* to develop this 2 minute 11 second short titled “Left in the Dark” featured at  
12 the 2015 Comic-Con in San Diego to provide Nickelodeon with a show that they  
13 would be happy to promote, buy, sell, and distribute for future profits. This short  
14 was later turned into the first 15-minute episode that became the premier for *The*  
15 *Loud House* series which introduces the character “Hunter” Spector. “Left in the  
16 Dark,” opens with Lincoln Loud using his camera to capture mysterious sounds  
17 and happenings. It is also redolent and indicative of *Max and Puppy*.  
18  
19  
20  
21

22 176) ***Live! With Truly*:** The following is the original opening scene for *Live! With*  
23 *Truly* sent to the THRID PARTY TajMania Entertainment by the PLAINTIFF. It  
24 opens with her brother trying out to be a photojournalist.  
25

26 a) Journalism 101 – *Live! With Truly*  
27  
28

TEACHER  
This will be our "think tank" board.  
Every Thursday we will meet to  
brainstorm stories to cover in the  
following weeks paper.

Bell rings.

TEACHER (CONTINUES)  
OK, pack up. I will see you tomorrow.

Truly closes her note book, puts her hair up with her pencil  
and grabs her bag.

TEACHER (CONTINUES)  
One more thing- If you want to be  
considered as the paper's photographer  
the submissions are due this week  
Friday.

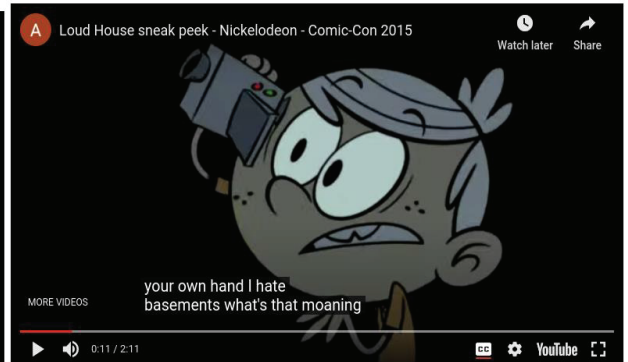
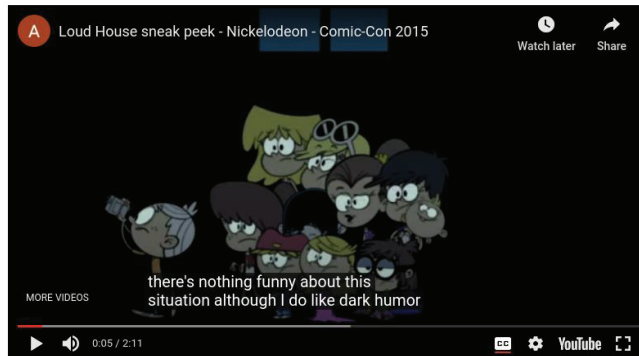
RYDER files out behind TRULY.

RYDER (LENS MEAT)  
I think I'm going to apply.

TRULY  
You should.

The presentation also included additional sneak peeks from *Harvey Beaks* and the upcoming series *Pig Goat Banana Cricket* and *The Loud House*.

The presentation also included additional sneak peeks from *Harvey Beaks* and the upcoming series *Pig Goat Banana Cricket* and *The Loud House*.



The presentation also included additional sneak peeks from *Harvey Beaks* and the upcoming series *Pig Goat Banana Cricket* and *The Loud House*.





177) *Max and Puppy* “Livingroom” setting: “Left in the Dark” ends similarly to *Max and Puppy* in pace and sequence but instead of Lincoln’s best friend (who was only introduced by “walkie-talkie”) joining him to watch movies on the couch with popcorn, it is his sisters. This theme is repeated in other episodes in the series such as “Overnight Success” a later episode pictured below.

a)

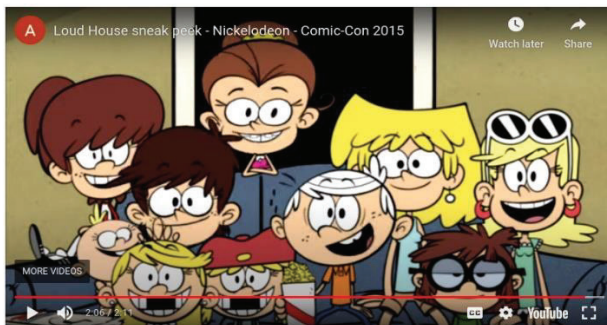
The presentation also included additional sneak peeks from *Harvey Beaks* and the upcoming series *Pig Goat Banana Cricket* and *The Loud House*.

The presentation also included additional sneak peeks from *Harvey Beaks* and the upcoming series *Pig Goat Banana Cricket* and *The Loud House*.



The presentation also included additional sneak peeks from *Harvey Beaks* and the upcoming series *Pig Goat Banana Cricket* and *The Loud House*.

The presentation also included additional sneak peeks from *Harvey Beaks* and the upcoming series *Pig Goat Banana Cricket* and *The Loud House*.



INTER - HIS HOUSE - LIVING ROOM ON THE COUCH

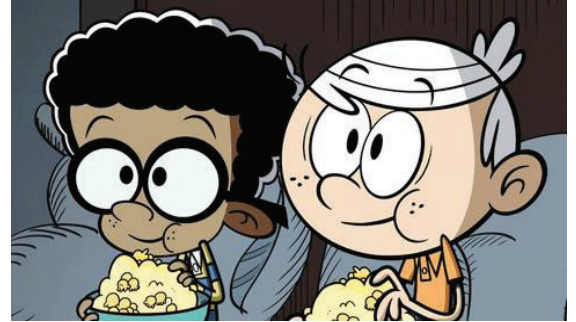
After everyone left Max and Nathan settled in the living room with popcorn to watch a movie. Puppy curled up on the floor in front of them. Every time he looked up at Max he wagged his tail.

MAX  
You're a good puppy.

Max said while petting his friend. Soon the boys had fallen asleep, puppy with them.

DAD  
They are going to make quite a pair.  
Remarked Dad who was looking on from the doorway with Mom.

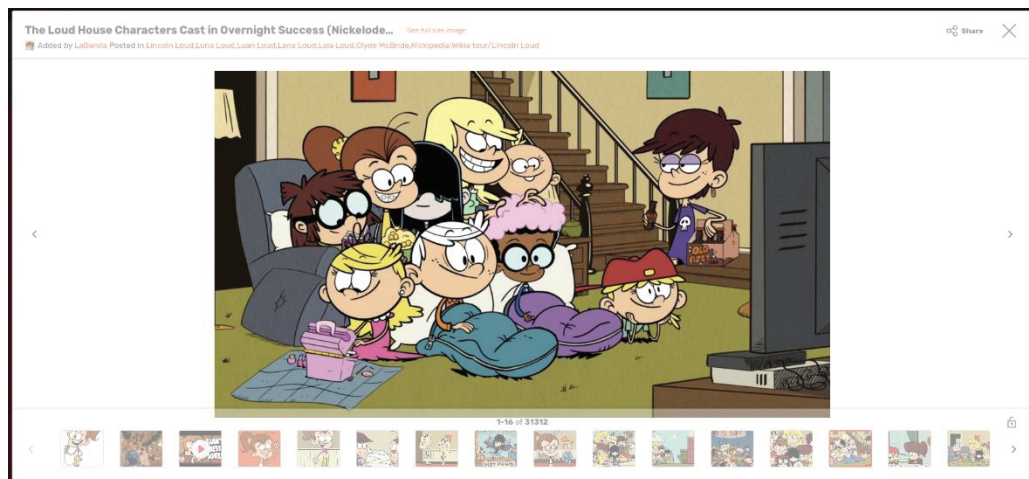
MOM  
They certainly are.



FADE OUT

THE END

*The Loud House: Episode "Overnight Success"*



**Copyright Infringement #6**

***Loud House, "Walkie-Talkies"***

178) **2014 "Walkie-Talkie" Email:** The following is an email between the PLAINTIFF Alethea O'Toole and DEFENANDT Howard Gimple, where the PLAINTIFF is discussing the characters using "walkie-talkies" to communicate.



Alethea Otoole <aletheao91@gmail.com>

**Idea for Max**  
2 messages

**Howard Gimple** <howard.gimple@gmail.com>  
To: Alethea Otoole <aletheao91@gmail.com>

Wed, Oct 1, 2014 at 9:01 AM

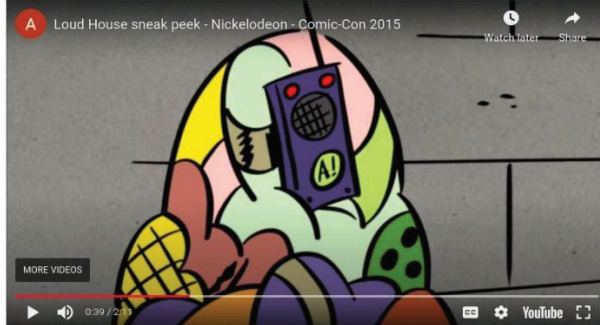
a)

Since this is a cartoon, therefore anything is possible, I like the idea of them having actual walkie-talkies / Nextel rather than pretend. I mean, why not right?

179) 39 seconds into the short “Left in the Dark” we are shown the introduction of Lincoln’s “walkie-talkie.” The walkie-talkie’s become a major element of the show and is used between himself and his best friend. The use of the “walkie-talkies” are used in nearly every episode from season 1-7.

The presentation also included additional sneak peeks from *Harvey Beaks* and the upcoming series *Pig Goat Banana Cricket* and *The Loud House*.

The presentation also included additional sneak peeks from *Harvey Beaks* and the upcoming series *Pig Goat Banana Cricket* and *The Loud House*.




The presentation also included additional sneak peeks from *Harvey Beaks* and the upcoming series *Pig Goat Banana Cricket* and *The Loud House*.



COMPLAINT FOR RELIEF, REMEDIES, AND DAMAGES CAUSED BY COPYRIGHT© INFRINGEMENT, AND  
ADDITIONAL CAUSES OF ACTION



The “Walkie-Talkie” scene lasts for 30 seconds of the 131 second short. They are purple with an  on them. A is also the first initial of the PLAINTIFF.

<https://theloudhouse.fandom.com/wiki/Walkie-talkies>

## Appearance

They are purple (dark green in “Last Loud on Earth”, “Family Bonding” and “’Twas the Fight Before Christmas”; blue in “Scoop Snoop” and “Snow News Day”; grayish blue in “Lights, Camera, Nuclear Reaction”), with a green circle with “A!” written on them, and they have two red knobs on top. On the bottom of the walkie talkies, there are two black screws. They have a red Push-To-Talk button on the side, and they have long, black antennas with a green spheres on top. In the middle, they have a gray speaker.

a)

Lincoln and Clyde each have **walkie-talkies** that they use to talk/communicate with each other.

### Contents

1. History
2. Appearance
3. Appearances
  - 3.1. The Loud House
    - 3.1.1. Season 1
    - 3.1.2. Season 2
    - 3.1.3. Season 3
    - 3.1.4. Season 4
    - 3.1.5. Season 5
    - 3.1.6. Season 6
    - 3.1.7. Season 7
  - 3.2. The Really Loud House
    - 3.2.1. Season 1
    - 3.2.2. Season 2
  - 3.3. Other media
4. Trivia

### Walkie-talkies

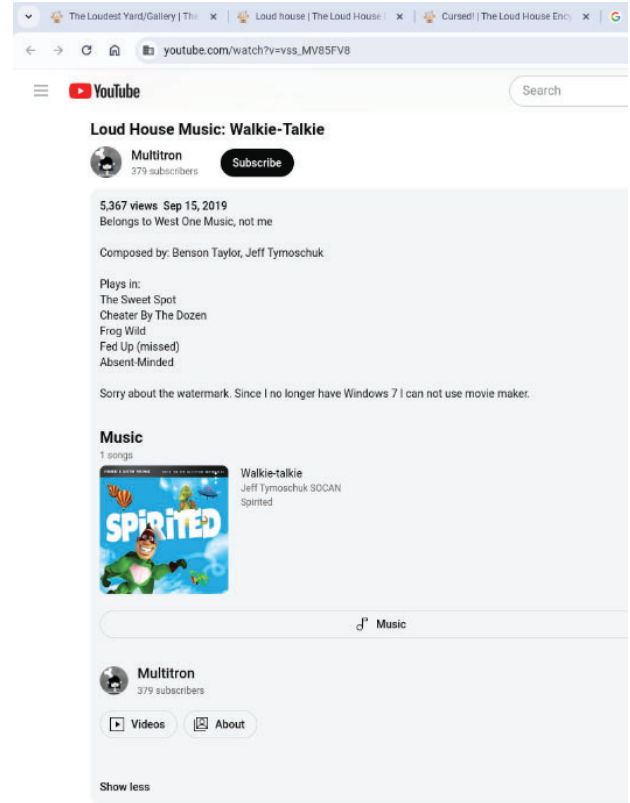
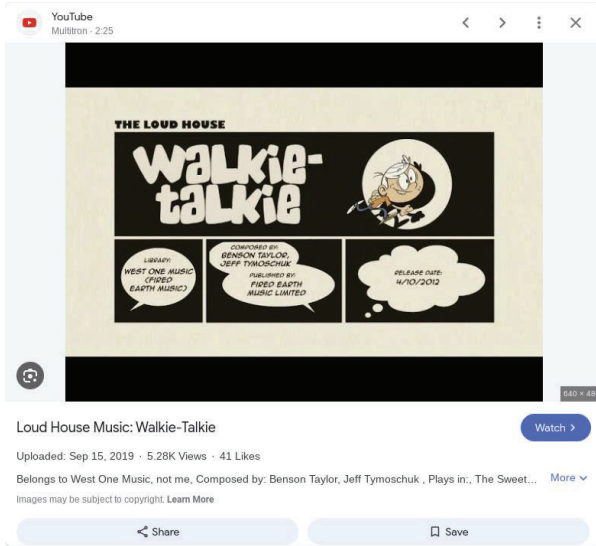
Type	Walkie-talky
Owner	Lincoln Clyde
Appearances	
First episode	“Left in the Dark”
<a href="#">[Source]</a>	

## History

Clyde and Lincoln are shown to use radio transmission talk. They say phrases like, “Over and out”, and “Roger that”.

b)

180) In the process of researching the PLAINTIFF discovered that the *Loud House* released music titled “Walkie-Talkie” which was used in several episodes. It is now accessible on YouTube.



## Copyright Infringement #7

### *Loud House, S1:E2 “Left in the Dark” and “Clyde McBride”*

181) **“Left in the Dark” short** - In “Left in the Dark,” Lincoln’s best friend (who was only introduced by “walkie-talkie”) is African-American and has a crush on Lincoln’s Caucasian sister. In the same respect, in the character development originally created by the PLAINTIFF a year before, the main character Truly was Caucasian and had a crush on her best friend’s brother who was African-American. It was symbiotic to the relationship between Mr. Haynes and Ms. O’Toole. In 2014 when the PLAINTIFF wrote *Live! With Truly* there were very few cartoons with multiple races represented as main characters, let alone interracial “dating”.



The presentation also included additional sneak peeks from *Harvey Beaks* and the upcoming series *Pig Goat Banana Cricket* and *The Loud House*.



a)

b) Character Description for Truly in *Live! With Truly*

pen/pencil so she always has something to write with. Her two best friends, Porter and Sugar, have lived around the corner from her since they were all in kindergarten. Truly has a crush on Sugar's brother PBJ but doesn't always show it. She is worried that she would lose two friends if anything went sour.



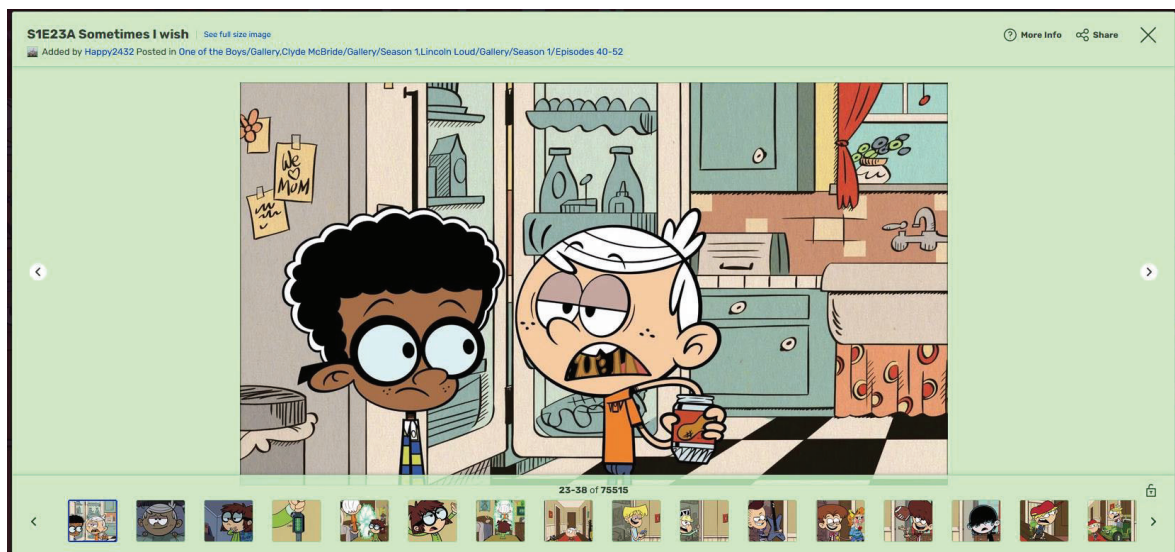
c)

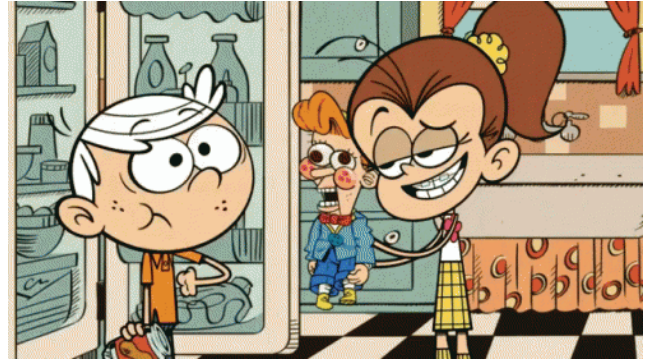
182) When the PLAINTIFF discovered the character representing “Lincolns’ best friend,” Clyde McBride, she immediately identified the character as drawn in the image of DEFENDANT Darryl Scott Haynes. The following is a photo of the DEFENDANT’S elementary picture, beside the character Clyde McBride. The

PLAINTIFF was shocked at the great detail in similarity that Chris Savino put into the rendering down to the blue and green striped shirt.



183) The PLAINTIFF asserts that the basis for the character being African-American stems from the photo of her son and his best friend, which in turn she had planned to style as the character PB&J after. The PLAINTIFF claims that DEFENDANT Chris Savino used willful actions to introduce the character Clyde McBride, a direct infringement on the author's work while incorporating the image of her ex-boyfriend Darryl Scott Haynes into the character.





Provincial Benjamin Jackson

(African-American) 16 year old boy. He is known as PB&J by his friends and sister (Sugar). Ryder is his best friend and Sugar is his sister. His parents are career military personnel. Their father once was a top secret computer programmer for the navy where PB&J picked up his aptitude for computers. He hates his name and goes by PB but his friends nicknamed him PB&J. He loves sports and champions for camera time.

184) The PLAINTIFF claims that DEFEDANT Mr. Haynes agreed to the condition of being added to the *Loud House* universe at will and was compensated for it. And that he makes claims of selling her scripts in later emails.

## Copyright Infringement #8

### *The Loud House*, short “Bathroom Break”

185) **April 18<sup>th</sup> 2016:** On April 18th, 2016 NickAlive! releases the following public statement, “The Loud House! - ‘Bathroom Break!!’ Original Short - Nickelodeon: ‘Check out this awesome & original short film from the Nickelodeon's newest animated series, *The Loud House!* premiering May 2nd at 5pm/4c on Nick USA!’”  
<https://www.nickalive.net/2016/04/the-loud-house-bathroom-break-original.html?m=0>



186) There seem to be discrepancies in the actual release date of the short. The PLAINTIFF has reason to believe that some news sources were back dated and that the true release date of this short was between 2015-2016 at or around the Comic-Con “Sneak Peek,” in 2015. The PLAINTIFF also recognized similarities in other elements of the work as derivatives of *Prince of Pizzan*. These elements are carried throughout the series in other ways and are repeated in *The Loud House Movie*, i.e. the checkered floors used in *Loud*’s kitchen, bathroom, at the “Royal Woods” schools, and throughout the castle floors in the movie.

a)



Monday, July 13, 2015

## First-Look At Nickelodeon's "The Loud House"

To celebrate Nickelodeon USA starting to premiere and show Nickelodeon's brand-new animated comedy series "The Loud House" from January 2016, Nickelodeon unveiled a fantastic sneak peek preview from the first episode of "The Loud House", titled "Left in the Dark", at Comic-Con International: San Diego 2015, which you can watch in the online streaming video clip [here on Toon Zone!](#)



In the series premiere episode of "The Loud House", "Left in the Dark", Lincoln and his siblings venture down to the basement during a power cut, where they are confronted by a series of scary situations, including a laundry ghost! Once power is restored, can Lincoln make it back to the TV in time to watch the best ever episode of "ARGGH!"?



Inspired by first-time creator Chris Savino's ("Rocko's Modern Life", "The Powerpuff Girls") chaotic life growing up in a huge household, the series will follow 11-year-old Lincoln as he gives an inside look at what it takes to survive in the bedlam of a large family, especially as the only boy with 10 sisters. The series is based off a short of the same name from Nickelodeon's 2013 Animated Shorts Program, and is scheduled to debut on Nick USA in January 2016. You can watch a online streaming video clip featuring Chris Savino's original Nickelodeon 2013 Animated Shorts Program short [here on NickALive!](#) Nickelodeon will held the world premieres of "The Loud House" and "Pig Goat Banana Cricket" at Comic-Con International: San Diego 2015 [on Saturday 11th July 2015!](#)

<https://www.nickalive.net/2015/07/first-look-at-nickelodeons-loud-house.html>



## Copyright Infringement #9

### *The Loud House*, "Making the Case" Season 1 / Episode 4

187) As mentioned in the preceding paragraphs, "Making the Case" was considered part of the heart of the *Loud House Movie*. Upon closer examination of the episode the PLAINTIFF finds that the premise of the episode is based on the heart of her work *Live! With Truly* where the main male character is submitting a photo to his school as part of a contest, or competitive submission to be the photojournalist on the school news paper.

JOURNALISM 101

INT. JOURNALISM CLASS ROOM - DAY - SAME TIME

Truly is sitting with her head propped on one elbow in class. She is listening to the teacher go over the class description and thinking about the year to come. It is her first day of high school and her first day as a journalist. She is getting more and more excited as she listens to the class outline. She blows a giant bubble and - pop!

TEACHER

This will be our "think tank" board. Every Thursday we will meet to brainstorm stories to cover in the following weeks paper.

Bell rings.

TEACHER (CONTINUES)

OK, pack up. I will see you tomorrow.

Truly closes her note book, puts her hair up with her pencil and grabs her bag.

TEACHER (CONTINUES)

One more thing- If you want to be considered as the paper's photographer the submissions are due this week Friday.

RYDER files out behind TRULY.

RYDER (LENS MEAT)

I think I'm going to apply.

TRULY

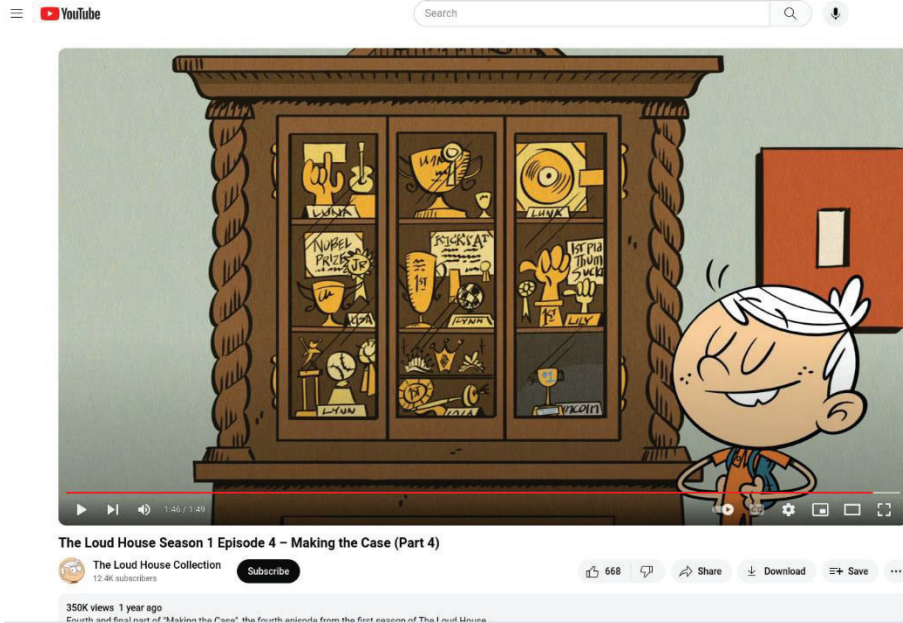
You should.

Enter Truly and Sugar. They walk out the front door of the school. (camera note - focus back on truly)

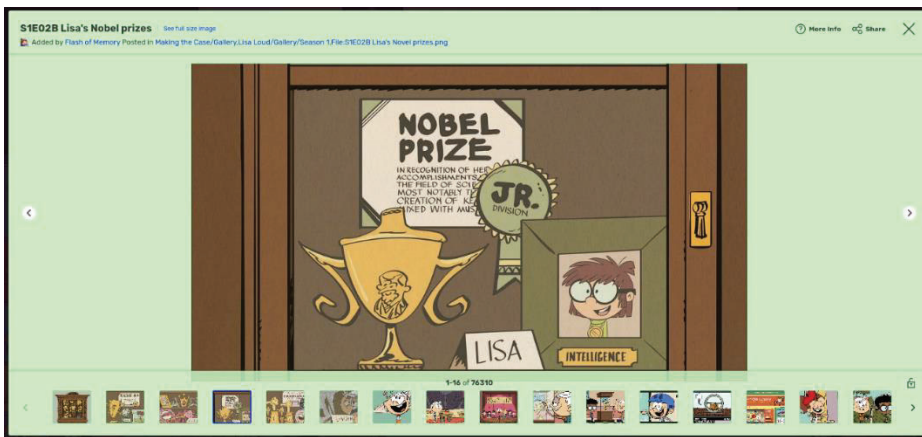
TRULY (CONTINUES)

We are heading to the library to study.

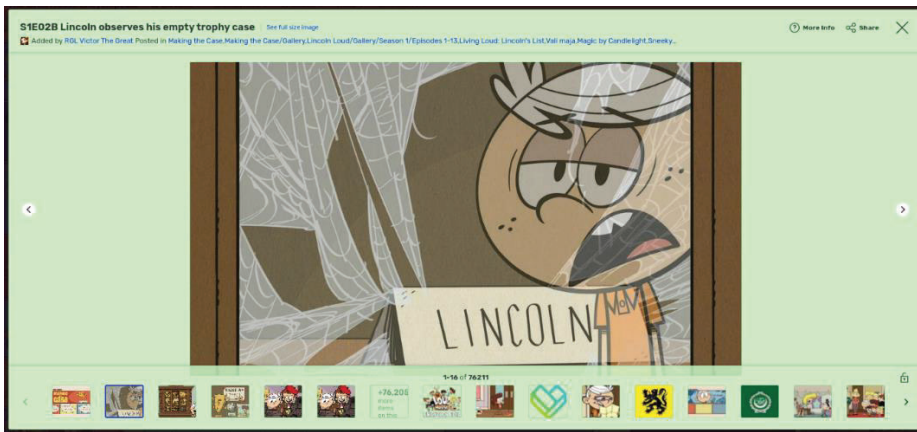
a)



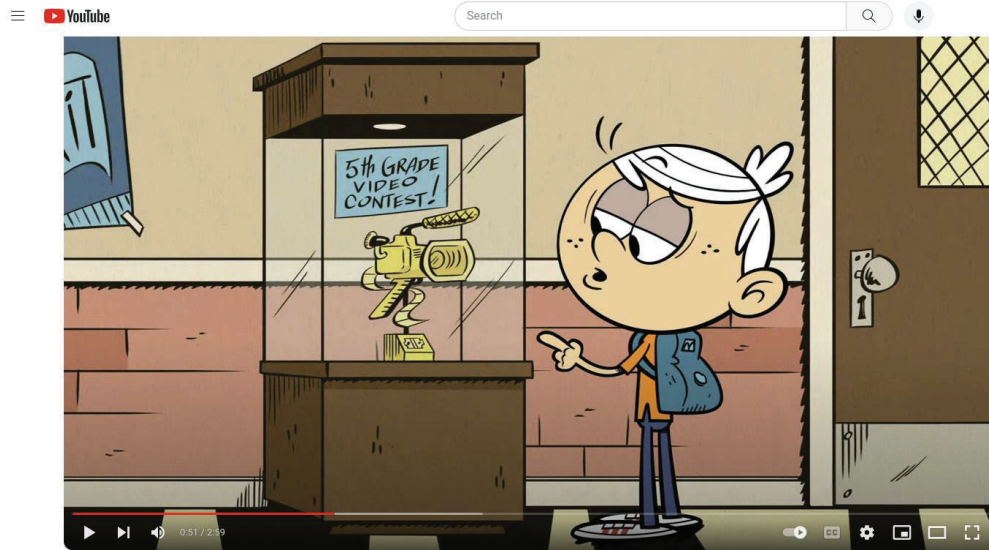
b)



c)



d)



The Loud House Season 1 Episode 4 - Making the Case (Part 1)

The Loud House Collection  
12.4K subscribers

Subscribe

862

Share

Download

Clip

Save

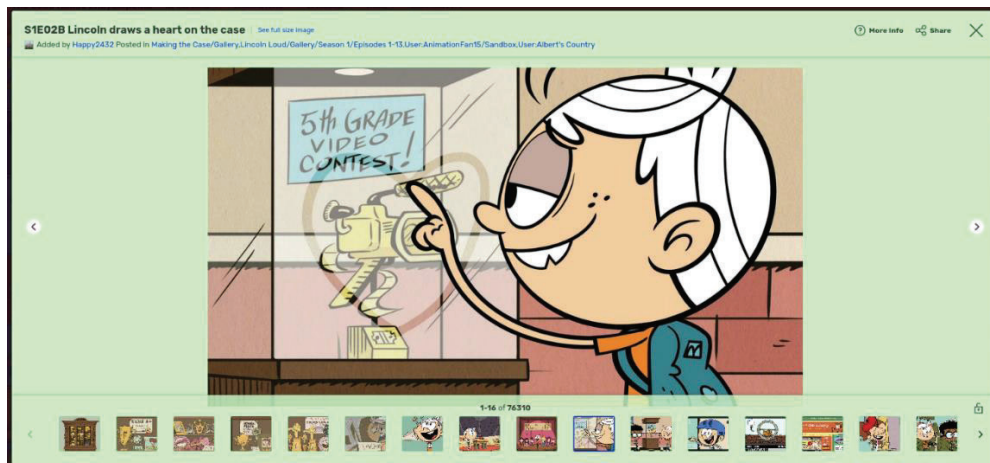
400K views · 1 year ago

NEXT PART:

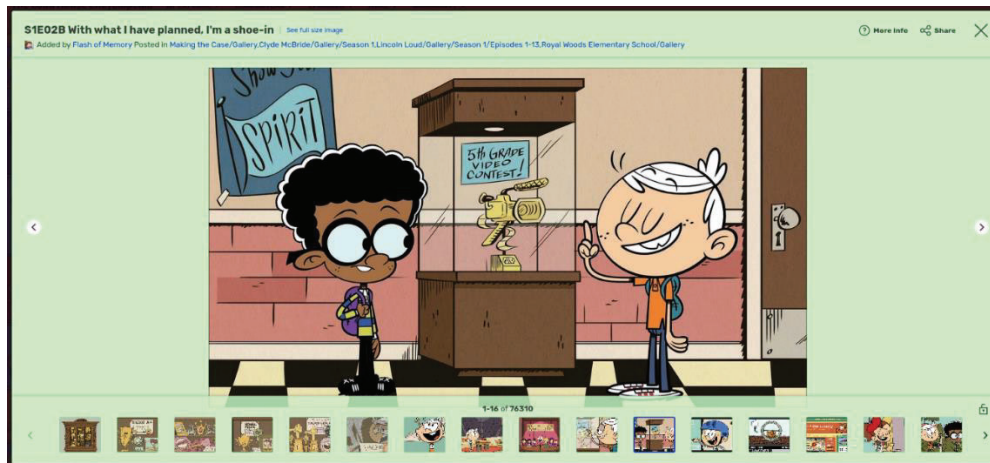
The Loud House Season 1 Episode 4 - M...

more

e)

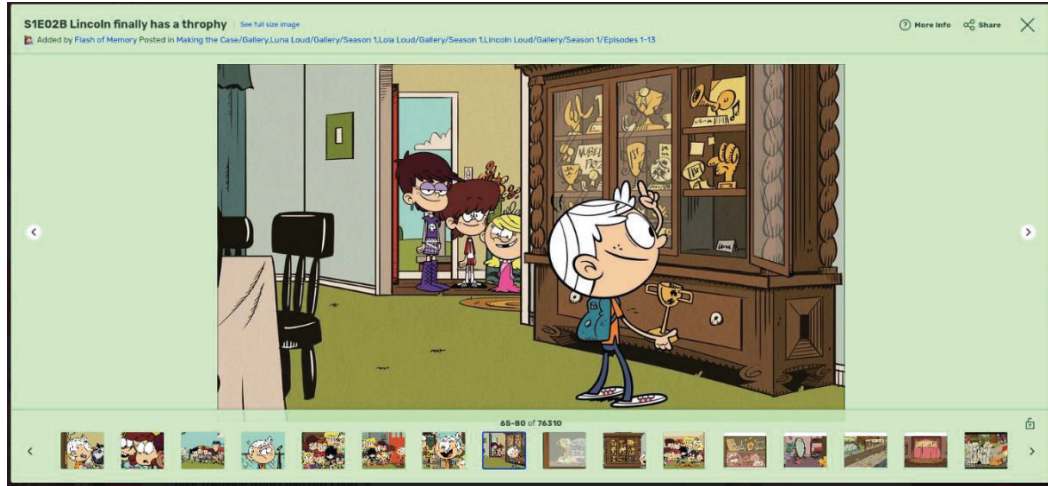


f)



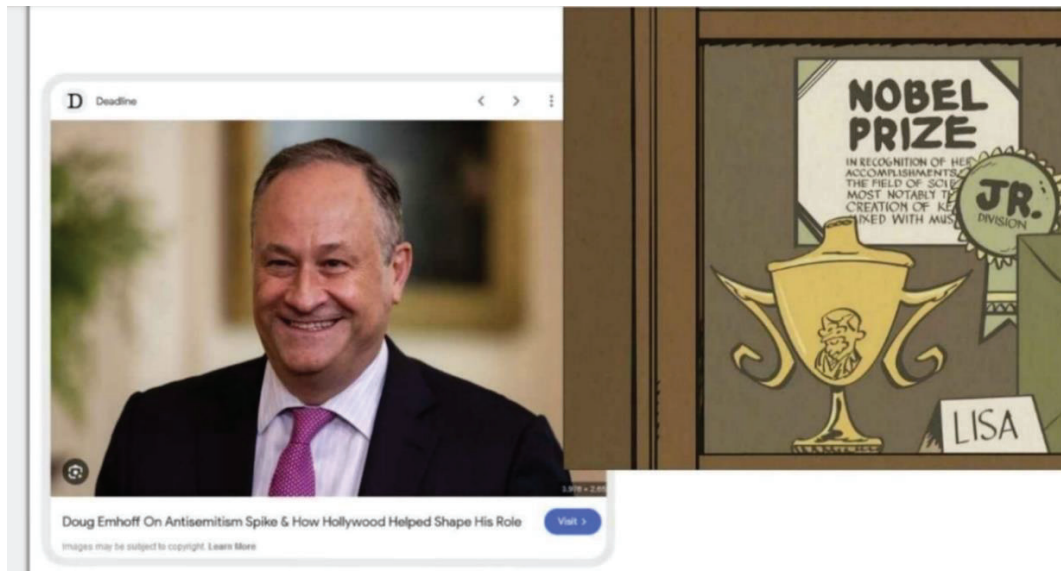
g)



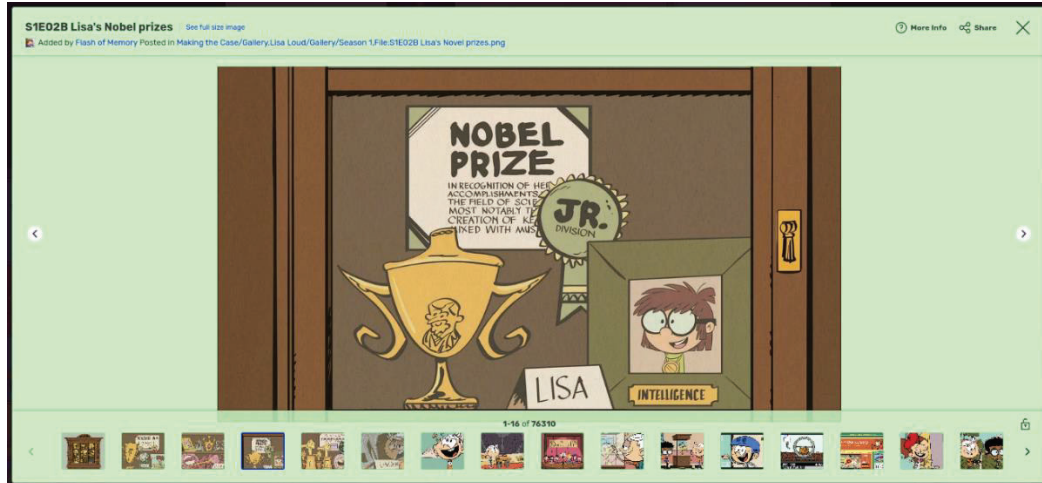


h)

188) The PLAINTIFF recognized the image on one of the trophies in “Making the Case”. The PLAINTIFF recognized the image, also used on the Title card for the episode, as Doug Emhoff; however, this episode was released prior to Mr. Emhoff becoming Second Gentleman of the United States. The episode was released around the time Mr. Emhoff joined DLA Piper, as an entertainment lawyer. DLA Piper is an international law firm with an office in DTLA. At the time his wife was Attorney General for California running for a Senate seat.



a)

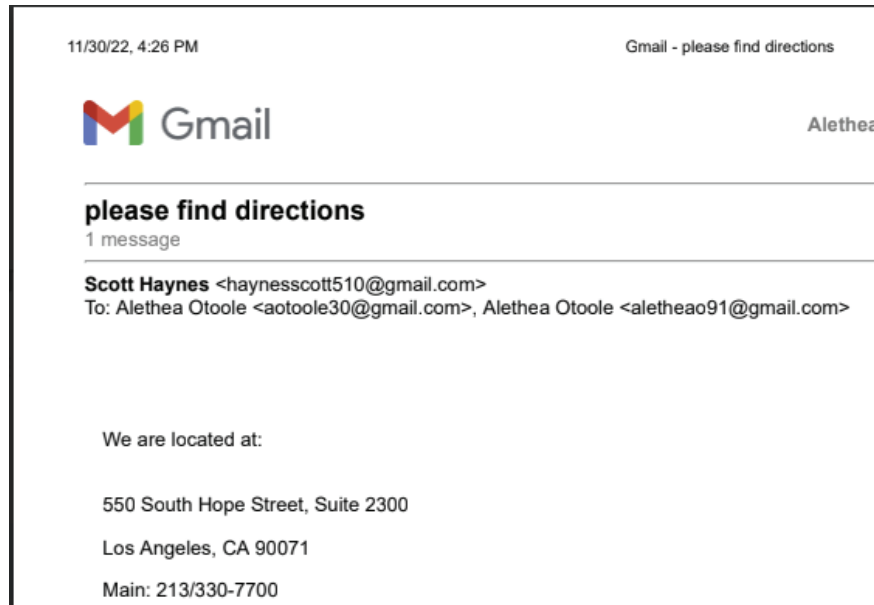


b)

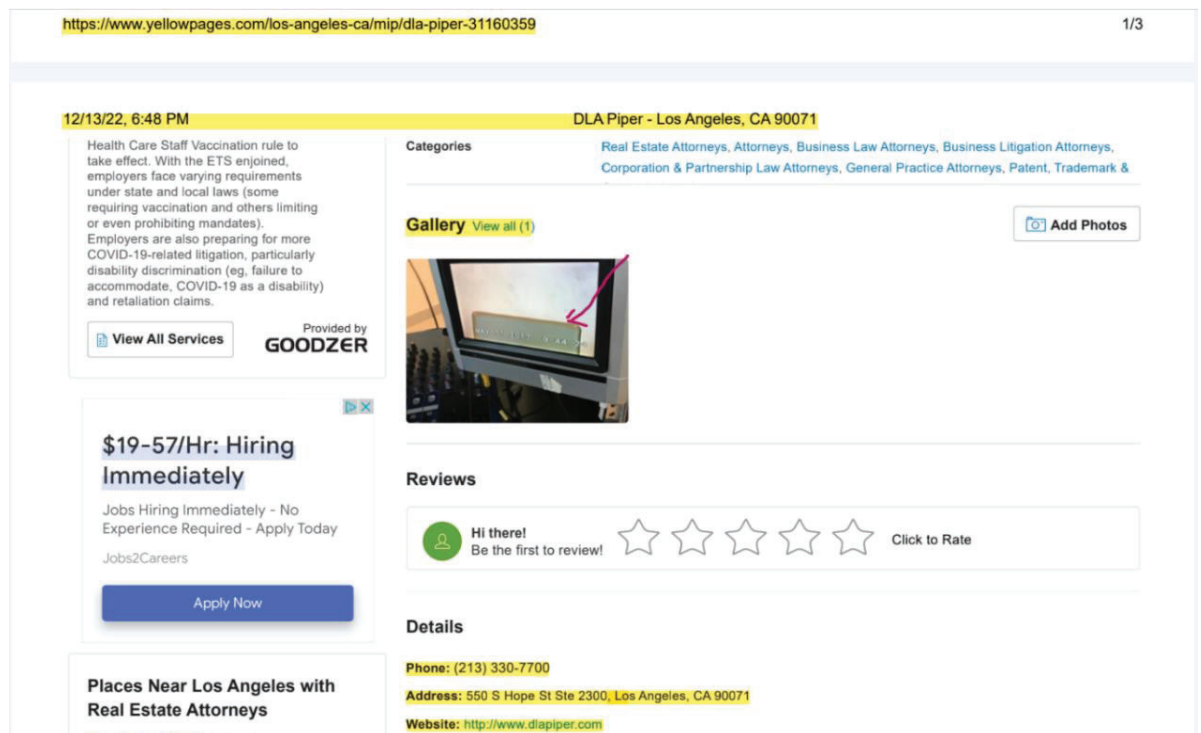
189) In 2022 while preparing files for court against DEFENDANT D. Scott Haynes, the PLAINTIFF came across an email from the DEFENDANT, requesting she find directions for the location of an interview she had committed to driving him to the following day. The PLAINTIFF Googled the address and found that it belonged to DLA Piper's downtown LA office; however, the PLAINTIFF also discovered that someone had posted an unsettling photo along with the company's contact information. The photo seems to imply that someone's confession, or other matters of importance was videotaped. It displays the date and time of the recording, May 11<sup>th</sup>, 2017. This date is significant as it is the day after DEFENDANT D. Scott Haynes' birthday. That year the 11<sup>th</sup> was on a Monday. In addition, the contact information displayed encouraged viewers to contact one of DLA Piper's tax attorneys that was now based out of the UK. The posting gave the name of the attorney and suggested "Discover" as the preferred payment method.



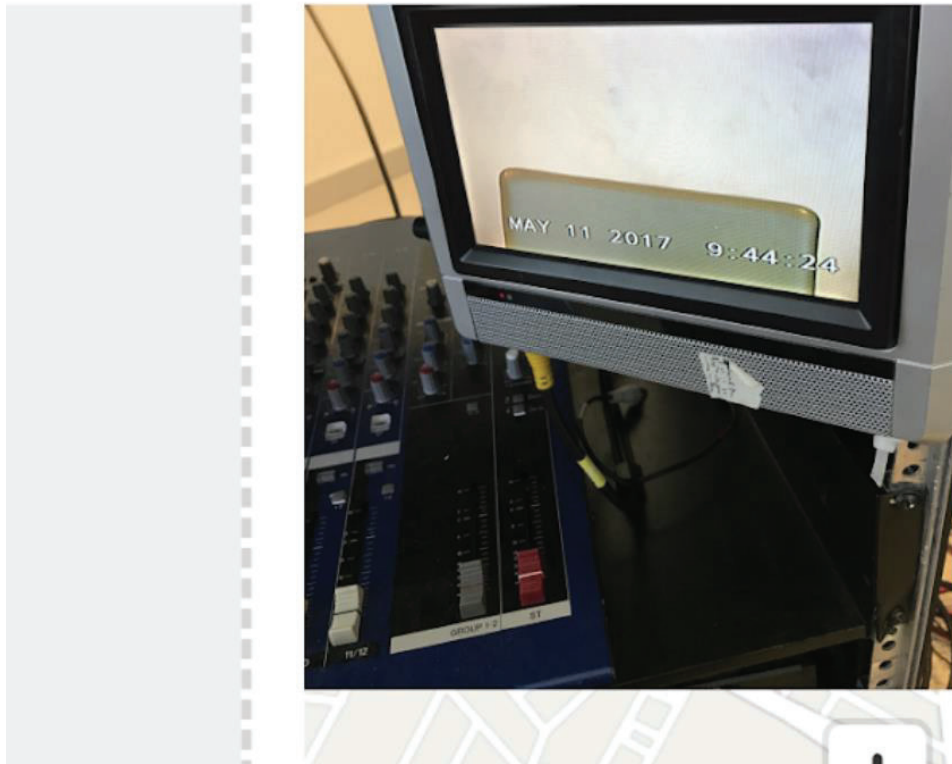
a)



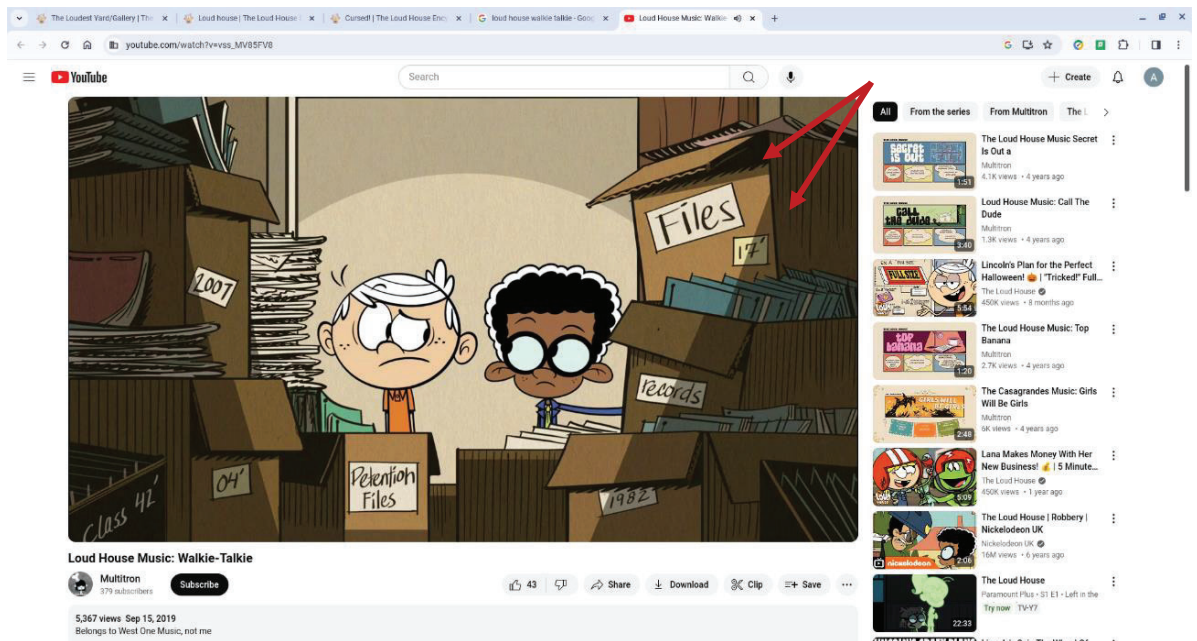
b)



DLA Piper Downtown LA, 550 S Hope St, Ste 2300, Los Angeles, CA,



c)



d)

**Copyright Infringement #10**

**“Action News Crew”**

190) Making the Case S1:E2b Released May 3, 2016 is the first glimpse into the arc of the show’s copyright infringements of the PLAINTIFF’S copyrightable elements of theme, setting, character, time sequence, pace, and total concept and feel which are protectable elements of copyrighted material registered under the Copyright Act, 17 U.S.C. § 101 et seq.

191) Nickelodeon builds off the “Making the Case” infringement and continues developments by officiating the Royal Woods “Action News Team”, where the characters begin a “news show” out of their “school” as a “team of reporters” with the main character’s “best friends” and “class mates” who make up the camera crew, news reporters, maintaining a live news stream, and hold regular meetings to plan out “news leads” and together organize the entire news show, which is supported by the principal, teachers and his parents. According to Fandom, the “team” did not get its name until the episode titled “Kernel of Truth.” The news team is the focus of 20 plus episodes and supported in theory by additional episodes.

192) Below are informative details about the introduction of this “school news” theme that has systematically trickled into “Kernel of Truth,” (Season 5: Episode 4B) leading to the infringements listed herein.

a)

The Loud House Encyclopedia

EXPLORE CHARACTERS EPISODES MORE COMMUNITY

The **Action News Team** is a school group of **Royal Woods Middle School** specializing in school news, consisting of **Lincoln Loud**, **Clyde McBride**, **Zach Gurdle**, **Liam Hunnicut**, **Rusty Spokes**, and **Stella Zhou**.

Contents[hide]

- Members
- History
- Live-Action
- Trivia
- Videos
- Notes
- Sources

**Members**

- Lincoln Loud** - news host
- Clyde McBride** - news host
- Zach Gurdle** - cameraman
- Liam Hunnicut** - cameraman

**Action News Team**

**Background information**

**First episode** "**Lincoln Loud: Girl Guru**" (all original members present)  
 "**Dance, Dance Resolution**" (as a group; original)  
 "**Be Stella My Heart**" (current)  
 "**Kernel of Truth**" (as the Action News Team)

[Source]

The Loud House Encyclopedia

EXPLORE CHARACTERS EPISODES MORE COMMUNITY

**Members**

- Lincoln Loud** - news host
- Clyde McBride** - news host
- Zach Gurdle** - cameraman
- Liam Hunnicut** - cameraman
- Rusty Spokes** - news reporter
- Stella Zhou** - news reporter, weather reporter
- Chandler McCann** (temporarily)<sup>[1]</sup> - news reporter, then weather reporter, then host of "Bro in the No" before being fired

**History**

While the Action News Team did not get their name until "**Kernel of Truth**", their members have assembled over the course of the series. **Lincoln** and **Clyde** have been friends since their early childhood, and Lincoln has known classmates **Zach** and **Liam** since "**Overnight Success**" while first meeting **Rusty** in "**Hand-Me-Downer**" (albeit in an antagonistic relationship). The five have become best friends by "**Dance, Dance Resolution**", and they eventually add transfer student **Stella** in their friend group<sup>[2]</sup> after Lincoln befriends her.<sup>[3]</sup>

In "**Kernel of Truth**", the six discover **Royal Woods Middle School** used to have a news show, one that included **Zach's mother**. With Clyde having had experience as the morning news host of **Royal Woods Elementary School**, they decide to reboot the news show, despite **Principal Ramirez** warning them



**The Loud House Encyclopedia** EXPLORE CHARACTERS EPISODES MORE COMM

## Trivia

- The term "Action News Team" has been used to describe both the group and the shared relationship between the group's members.<sup>[5]</sup>
- As of November 27, 2024, twenty episodes focus on the group as a whole.<sup>[note 1]</sup> If counting episodes prior to Stella's introduction, then the list also includes "Back Out There" and "Pasture Bedtime".
  - Additionally, fifteen episodes focus on specific members of the group, with the other members in supporting roles.<sup>[note 2]</sup> If counting episodes prior to Stella's introduction, the list also includes "Lincoln Loud: Girl Guru", "Dance, Dance Resolution", "Making the Grade", "Out of the Picture" and "Teachers' Union".
- "Action News" also serves as the branding for newscasts of several stations in the United States and Canada (for example: WPVI-TV in Philadelphia).

## Videos

**The Loud House Encyclopedia** EXPLORE CHARACTERS EPISODES MORE COM

## "Kernel of Truth"

"Kernel of Truth" is the fifth episode (sixth in production order) of the fifth season, and the two-hundred-fourth episode of *The Loud House*.

Contents[hide]

- Plot
- Synopsis
- Cast
- Trivia
- References
- Errors
- Videos
- Sources

## Plot

Lincoln and the Middle School Action News Team solve the mystery of the missing popcorn.

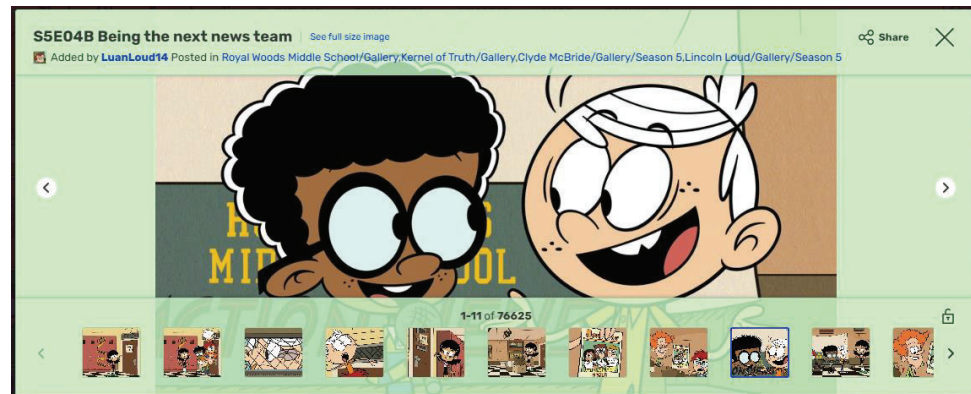
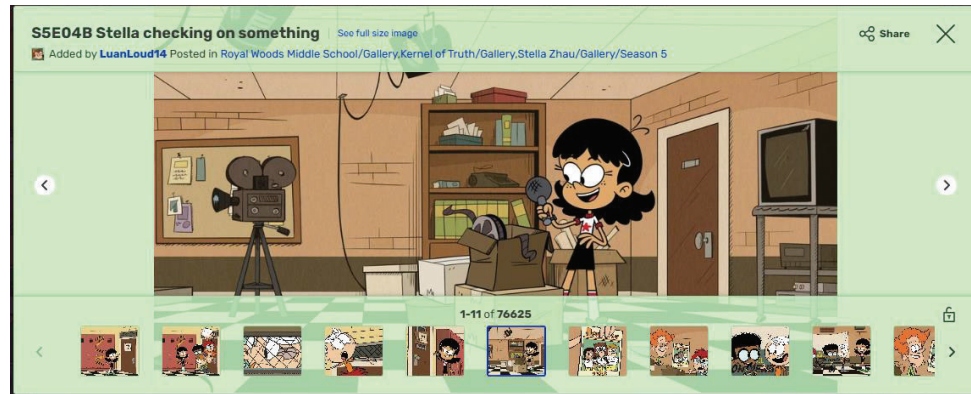
Kernel of Truth		
Season	Episode	Overall
5	4b	204

**Broadcast Information**

Airdate	
September 25, 2020	
October 3, 2020	
November 6, 2020	
November 6, 2020	
November 11, 2020	
December 2, 2020	
December 2, 2020	
December 2, 2020	

<b>Production Code</b>	504b
<b>U.S.</b>	7:15pm

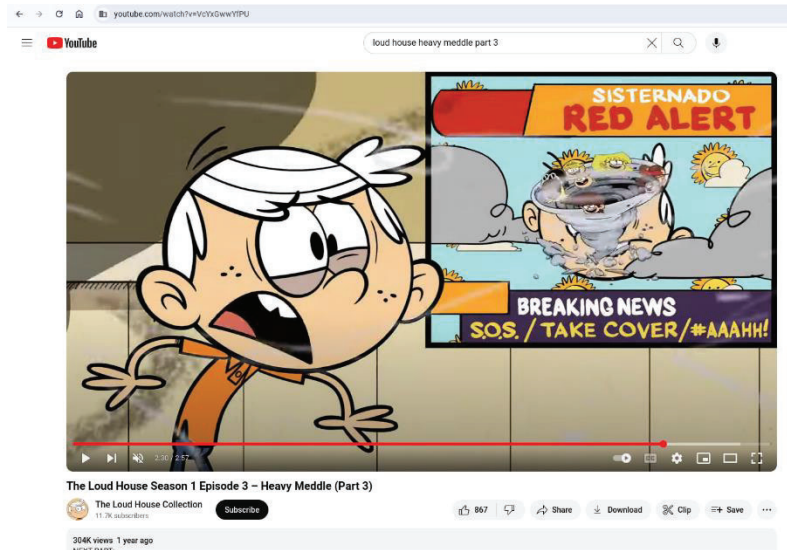




## Copyright Infringement #11

### “News Anchors and News Casters”

193) The PLAINTIFF recognized further infringements in this same “news” vein which were present in both *Live! With Truly* and *Max and Puppy*. From the author’s second installment of the *Max and Puppy* series titled “Puppy’s First Snow,” Max wakes up to the “weatherman” reporting on a snowstorm and the first snow day of the year.



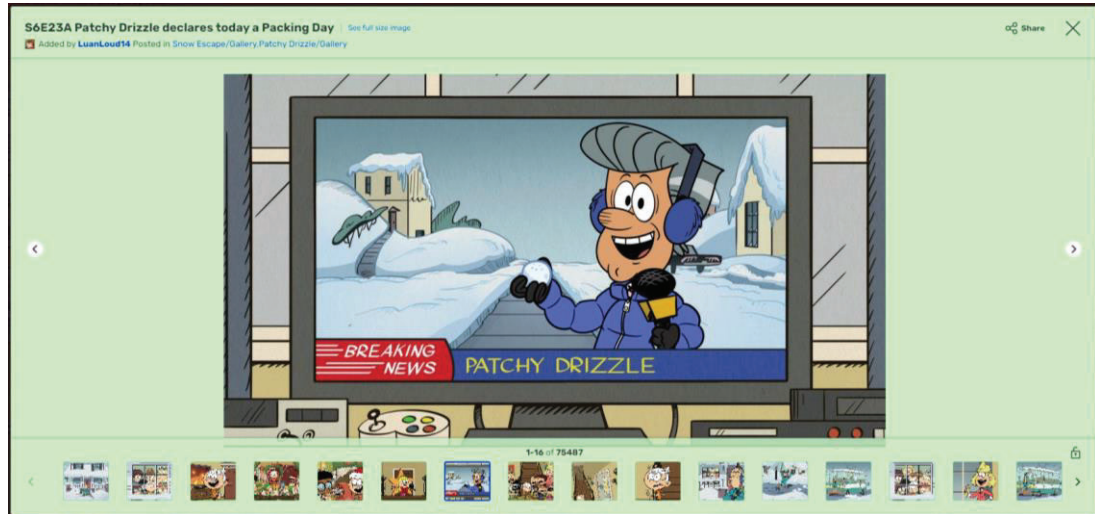
*Live with Truly*

#### REPORTER VOICE

In other news scientists from Metro Technology have confirmed that they are working on their first quantum computer and hope to merge that technology with gamma ray propulsion energy for future space travel.

194) In *Live! With Truly*, the PLAINTIFF often references the main characters being alerted of “breaking news” a “reporters voice” is heard reading the news anchors

stories as the camera sees the characters reading the story on the screen via their phone, tablet, or electronic device.



#### Max and Puppy: Puppy's first snow

It was Friday morning and the weather man had said there was a heavy snow storm on the way. And heavy snow meant snow days! Max loved snow days, no school, great sledding, snow men and the best snow ball fight he could have with his best friend.

The alarm had not even rung Max was up and threw the curtains back. The blanket of snow that covered the ground was so thick he couldn't tell where the sidewalk started and the road ended. Beautiful white snow piled on the pine branches and made them sag under the weight. Icicles hung from the branches of bare maple trees. Not a foot or a tire had set its track on this pristine scene.

"Look at all that snow!" Max exclaimed looking at Puppy. Puppy stood next to him his front paws on the window his nose pressed to the window. He wagged his tail at Max's excitement.

Max ran to his parents' room with puppy right behind. Max jumped on their bed, "It's going to be a snow day! A snow day, a snow day, a snow day..." Max sang.





## Copyright Infringement #12

### *The Loud House, “Luan Loud” V. Live! With Truly, “Truly”*

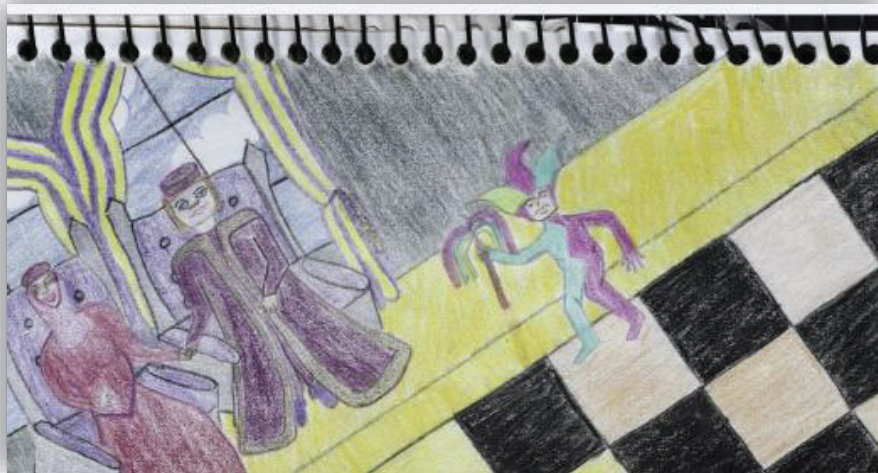
195) After first learning of the *Loud House* series, the PLAINTIFF began to recognize various characters as people associated with her personal life. One of the first character’s she recognized was of “Luan Loud” whom the PLAINTIFF easily recognized as herself. At the time the character was drawn the PLAINTIFF had clear braces and often wore her hair in a ponytail.





196) The PLAINTIFF soon began to recognize character traits, personal situations, and themes specific to “Luan Loud” that were indicative of her authorship and/or her as an author. (See EXHIBIT “Alethea O’Toole”). The PLAINTIFF also found many of the characteristics demonstrated in Luan as derogatory and defamatory.

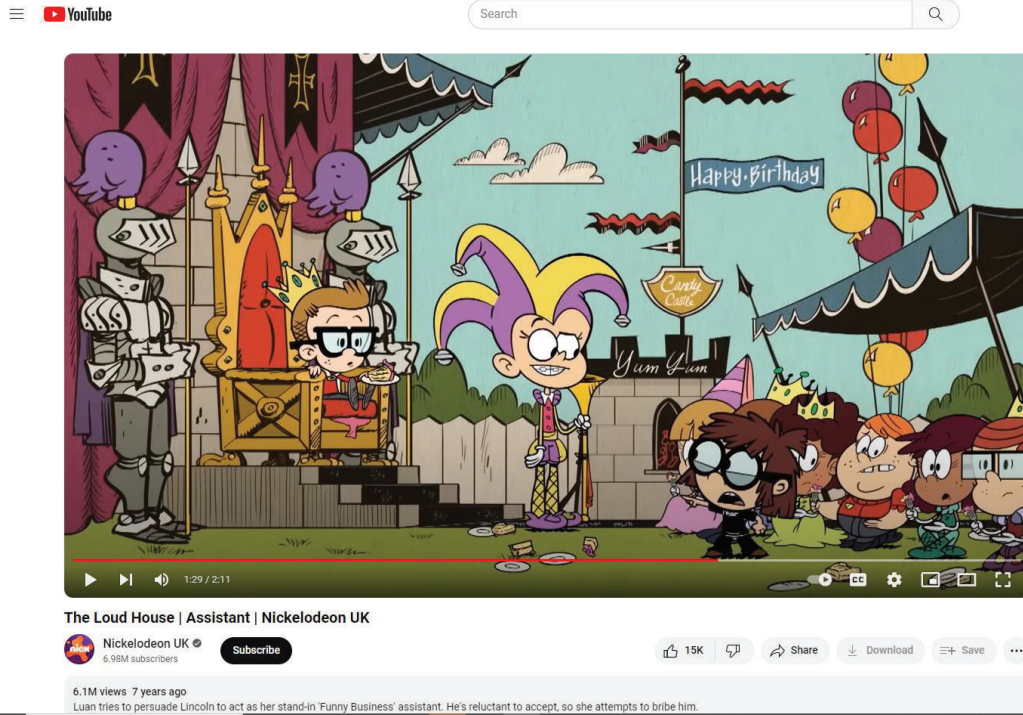
a) The PLAINTIFF discovered artwork storyboards depicting “Luan Loud” dressed as a “Jester” and a “Joker.” The costumes were incorporated into multiple episodes of the *Loud House* series. The PLAINTIFF claims these actions to be an infringement of *Prince of Pizzan*.



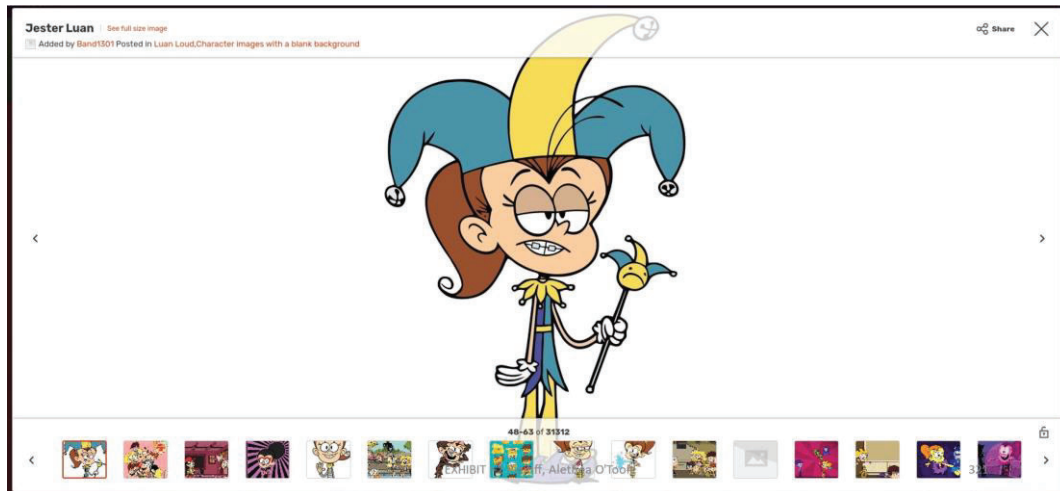
a)



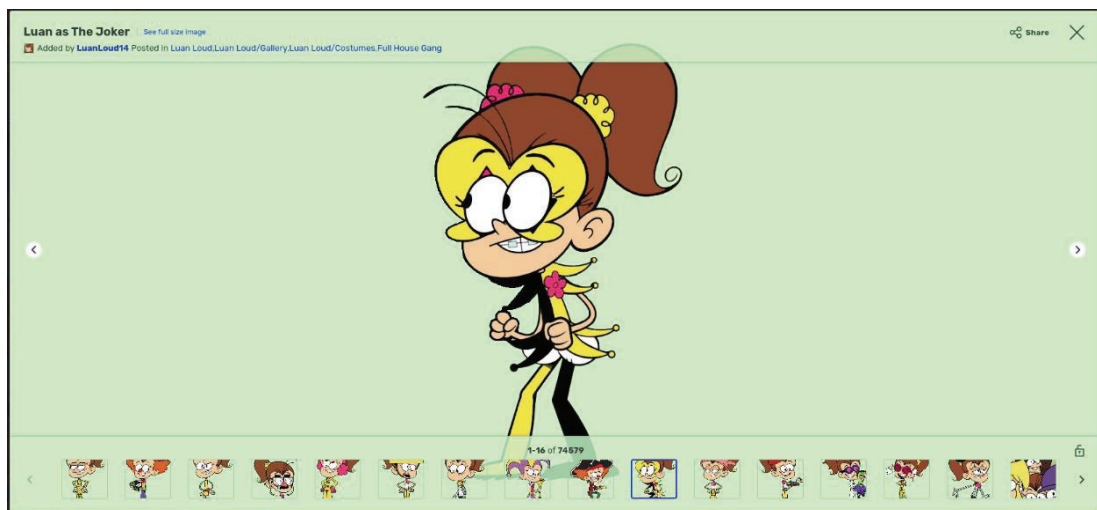
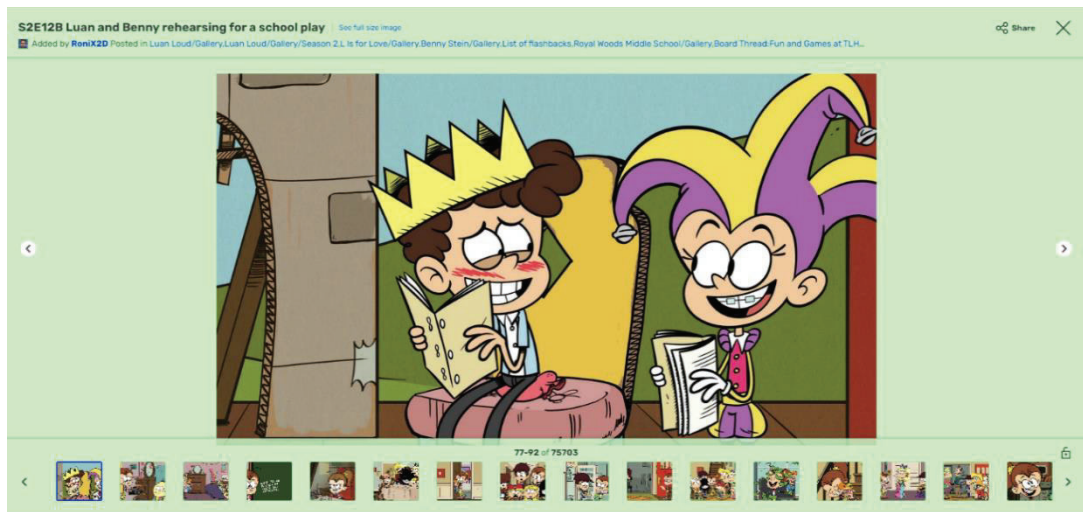
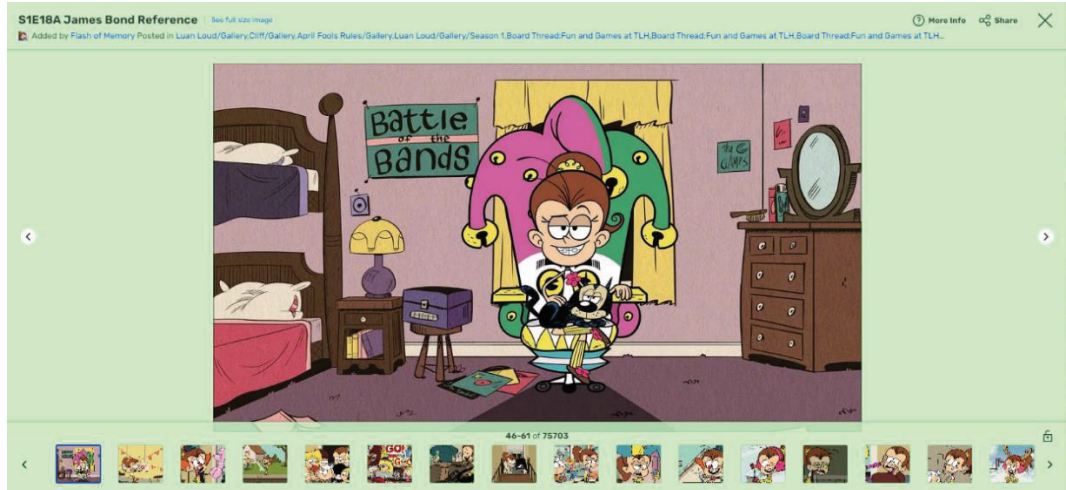
b)



a)



a)

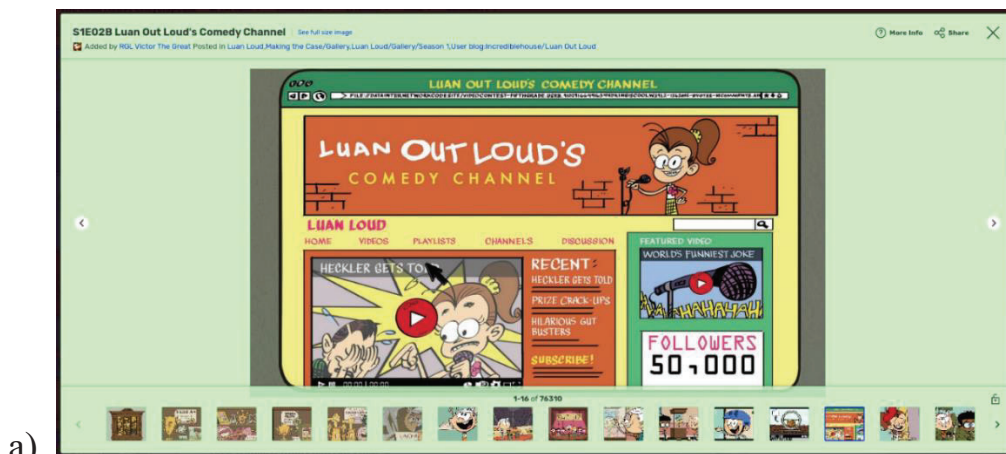




## Copyright Infringement #13

### “Live with Truly: Truly’s YouTube channel/Blog”

197) In the Pilot episode of *Live! With Truly*, the main character “Truly” decides to start a streaming channel such as YouTube as a means to make money. In one storyline description the PLAINTIFF sent to DEFENDANT Howard Gimple, the episode ends with “Truly” waking up to 500,000 subscribers. The PLAINTIFF alleges that not only did DEFENDANTS introduce the character “Luan Loud,” as having her own online business with 50,000 subscribers, into *The Loud House*, but that they did so through defamatory means by making her business into a “joke”.





1 Truly finds an old DVD and lifts it out of the bin.

2 TRULY  
3 Puurrfect, look "Zombies Come at  
4 Midnight" Chris will love this.

5 SUGAR  
6 Oh yeah, (she laughs) my brother is  
7 such a zombie freak. They have vinyl  
8 in the back. I want to find him  
9 something there.

10 Truly flips the movie over. \$20.00

11 TRULY  
12 I need a job.

13 SUGAR  
14 Yeah, wouldn't you love to make the

15 a)

16 kind of money as a gamer!

17 TRULY  
18 That's it! We should start a blog and  
19 news channel.

20 b)

21 Sugar's phone dings. She pulls it out of her pocket. We see  
22 the headline: Metro Technologies.

1 They head to their rooms. TRULY follows RYDER into his room.  
2 Chance follows them both.

3 TRULY  
(To CHANCE) Hey boy, I missed you.

4 TRULY plops down on RYDER'S bed

5 TRULY (CONTINUES)  
6 Hey,

7 RYDER  
8 What's up?

9 TRULY  
10 I've been thinking about starting a  
11 news channel. I want you as my  
12 videographer. What do you think?

13 RYDER (LENS MEAT)  
14 what are you going to call it?

15 TRULY  
16 I don't know...

17  
18  
19 RYDER (LENS MEAT)  
20 How about "What's up?"

21 TRULY  
22 ohh, i love it!

23 She makes a rainbow motion with her hand.

24 TRULY  
25 "What's Up Metro City." I love it.

26 She hugs her brother.

27 TRULY (CONTINUES)  
28 Thanks!

## Copyright Infringement #14

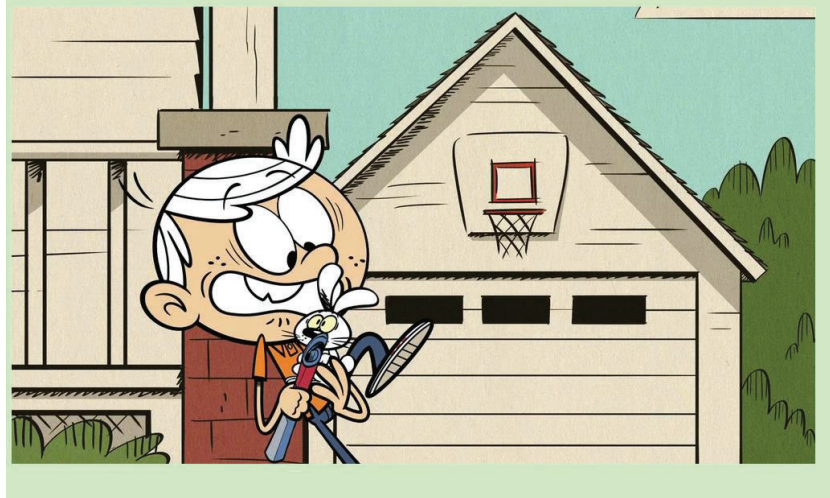
### Additional Infringements from *Max and Puppy*

198) One of the main theme's in *Max and Puppy* is the father's juggling act, and magic tricks at Max's birthday. In the process the character shows the audience the following items: "a very cute stuffed white rabbit," a "rubber chicken," and various items he took out of the "trunk." In the following images, these *Loud House* episodes depict "Luan Loud" as a "clown" performing tricks at Birthday Parties for her business. The images are derogatory and defamatory in nature by depicting the original author of the infringed material as a "clown" and a "joke."

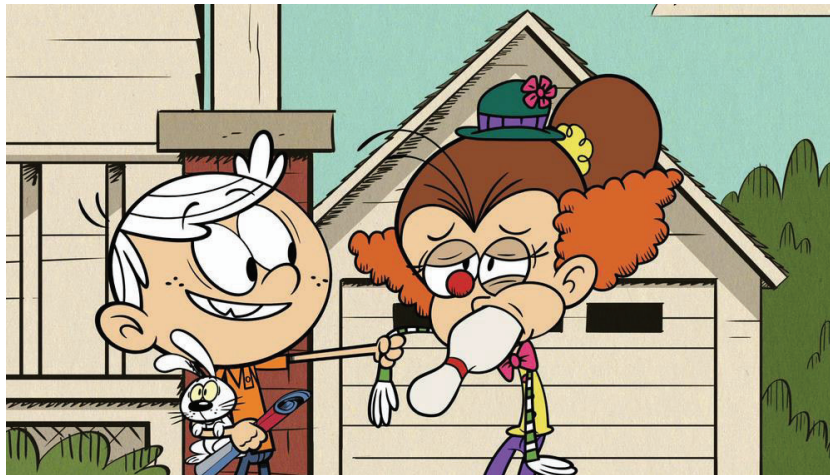
Clara was relieved and handed over the puppy. Puppy gave the Amazing Fredro a giant kiss across his face as if to say thank you. "Ladies and gentleman you should never juggle puppies but you can juggle *rrrrabbits!* Now let's see where I put that..." He went to a trunk and began taking things out one by one raising it high in the air for everyone to see while his nose was deep in search. "A book...no...a sock...no...aha! A rubber chicken...no...here it is a *rrrrabbit!*" Out emerged a very cute stuffed white rabbit. "Before I begin I will need two more items from the audience."

a) "Very well, the Amazing Fredro will juggle this *rrrrabbit*, this soccer ball and this tennis ball." The audience laughed and cheered for the Amazing Fredro as he continued to entertain them with his juggling act and jokes.

199) In Season 1: Episode 24A the shows recreates the juggling act with "Luan Loud" and "Lincoln Loud." The images include the: "a very cute stuffed white rabbit," a "rubber chicken," and various props Luan attempted to juggle. A bowling pin is shoved in "Luan's" mouth after she falls off her unicycle while practicing her act. The PLAINTIFF finds these themes and characteristics as defamatory and derogatory.



a)



b)



c)





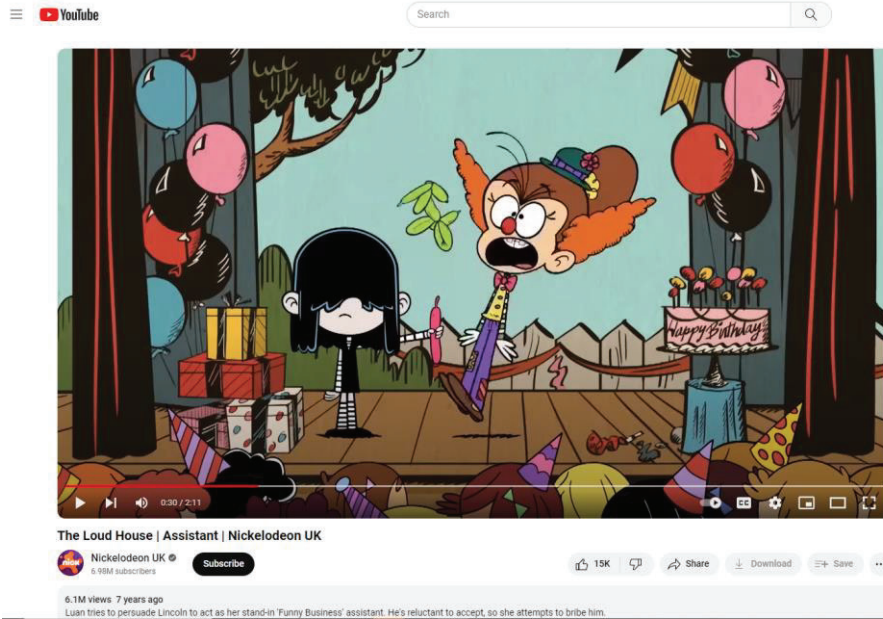
a)

200) This section of *Max and Puppy* describe the Birthday Party tents that set in the backyard for “Max’s” birthday. The first paragraph describes the birthday tents as one being designated as the “Circus Circus” tent, and the other as the “Big Top” tent. The second paragraph mentions “dress up clothes” “clown noses” and “rainbow colored wigs.” Below are images:

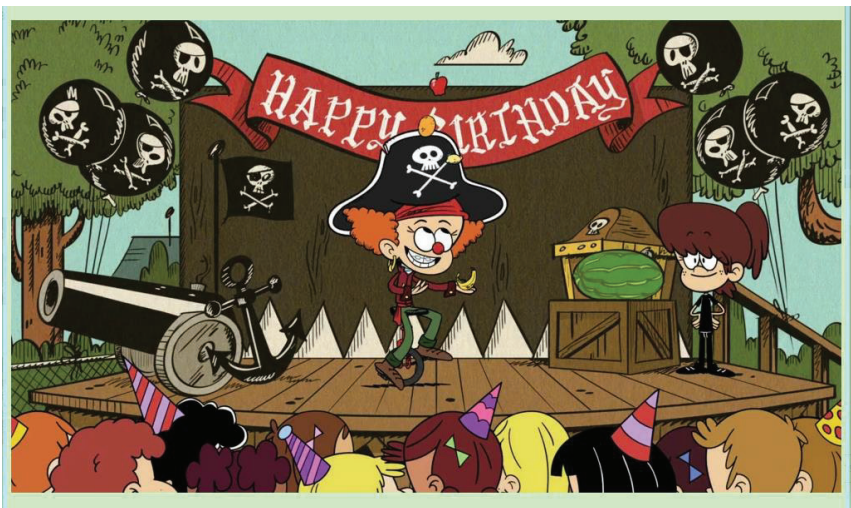
Max nodded and they all followed her into the back yard. Two white tents had been raised. Colorful decorations hung from the tents. Across them were large signs in bright red and yellow letters. One said Big Top Games the other said Circus Circus. The Big Top tent had three games set up were people could win prizes. A ring toss, bean-bag toss, and the one-armed-shooter.

At the Circus Circus tent blankets had been spread on the floor for audience members to sit on. On one side of the tent was a second table laden with magic tricks for the children to try. On the other side was a third table full of dress up clothes including clown noses and silly circus props. That’s were Max’s mom and a friend would paint faces and help kids put on rainbow colored wigs or over sized ears.

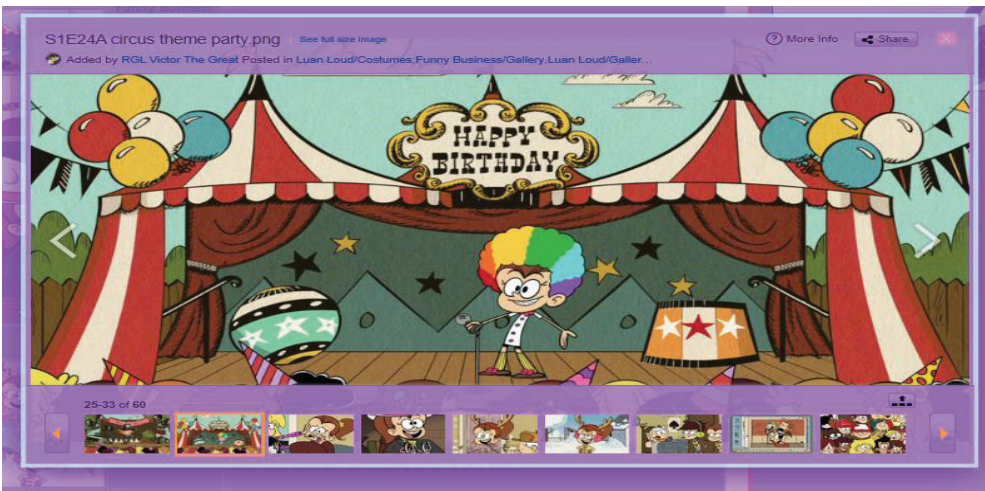
a)



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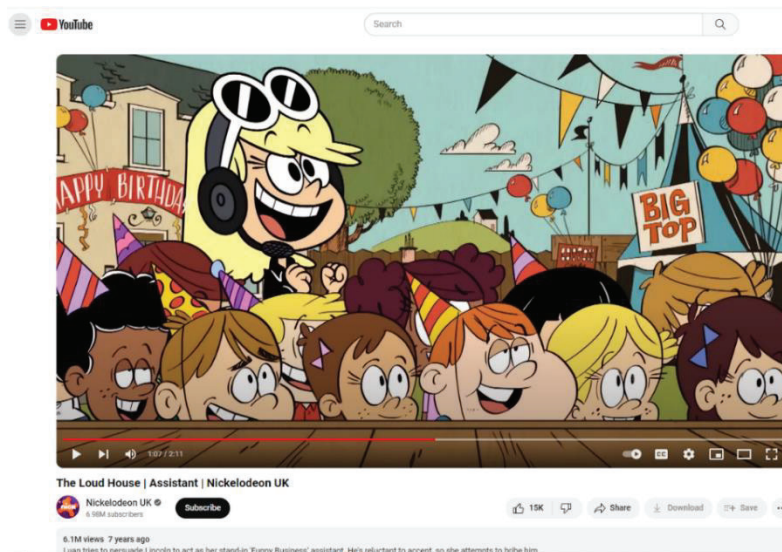
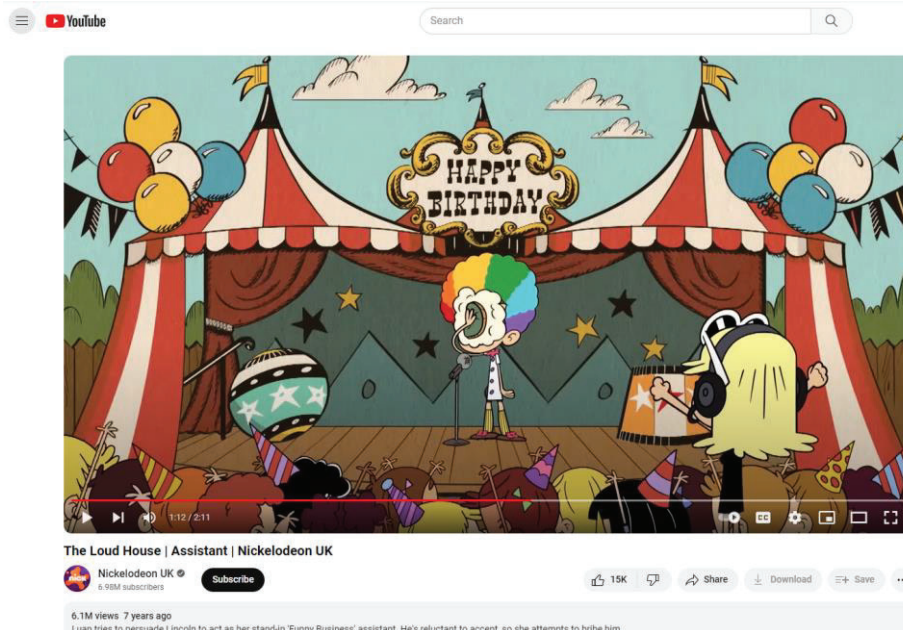
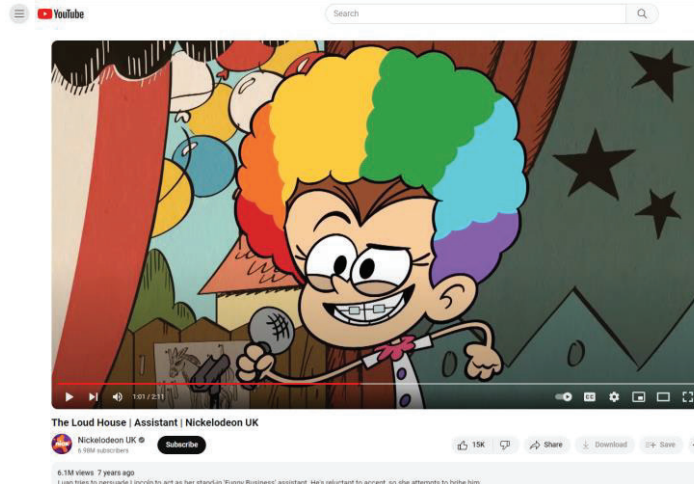


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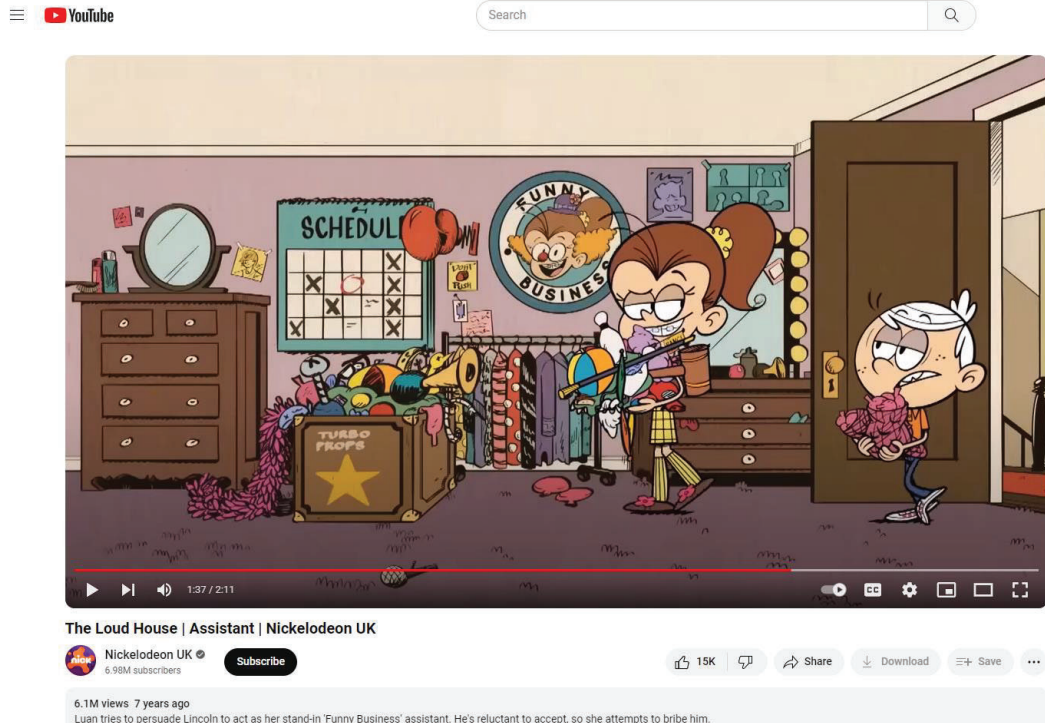


d)





COMPLAINT FOR RELIEF, REMEDIES, AND DAMAGES CAUSED BY COPYRIGHT© INFRINGEMENT, AND  
ADDITIONAL CAUSES OF ACTION



a)

## Copyright Infringement #15

### *The Loud House*, "Heavy Meddle" Season 1: Episode 2A and character Ronnie Anne Santiago

201) **Heavy Meddle S1:E2a:** The episode "introduces into the universe of the show" the first character outside of the Loud siblings. Upon seeing storyboard work of the episode, the PLAINTIFF recognized the new character, "Ronnie Anne", as a derivative of the true author's original character "Porter" who later becomes, what the STUDIO and COMPANY call the "main procrastinator" for the spin-off show *The Casagrandes*.

202) The *Live! With Truly* character "Porter" is a Hispanic female, whose parents work in the medical field. More specifically her father is an orthodontist. Their family immigrated from Guatemala, in the southern parts of North America, and



1 maintains ties to her ethnic roots. The PLAINTIFF made a conscious decision to  
2 make “Porter’s” family successful by means of her father’s achievements as an  
3 orthodontist, which is an attainable goal, to give hope to impoverished families of  
4 immigrants and the children she hoped to reach through her writing.  
5

6 203) In *Live! With Truly*, “Porter” becomes one of “Truly’s” best friends and  
7 classmates. “She loves art and often incorporates her heritage into her artwork...”  
8 During the creative process, the PLAINTIFF started *Pinterest* “boards” to select  
9 styles for the characters. Below is an example of “Porter’s” style. Although the  
10 *Loud House* version has been redesigned and now has a striking resemblance to the  
11 character “PB&J’s” style in *Live! With Truly*.  
12  
13  
14

15 204) In fact, the PLAINTIFF discovered that the current appearance used in *The*  
16 *Loud House* and *The Casagrandes* was not the original appearance introduced in  
17 2016.  
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